

CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

May 11, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through April 30, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 2 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

May 11, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 244587 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through April 30, 2021:

Matter #	Description	Services	Expenses	Total
36384	NIR Senry	63,989.50	517.12	64,506.62
Total		65,025.00	517.12	65,542.12

TOTAL THIS INVOICE \$ 65,542.12

Previous Balance \$73,021.50

TOTAL BALANCE DUE \$138,563.62

Invoice #: 244587 May 11, 2021

Invoice #: 244587 May 11, 2021

Client-Matter: 10255-36384

RE: NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
4/01/21	MLM	Review and analyze trade secret theft complaint.	.50
4/01/21	SRM	Work on verified complaint and related filings for preliminary injunction.	2.90
4/01/21	JTG	Develop facts, draft brief review of law; calls with client.	8.70
4/01/21	PKZ	Meeting with J. Gutkoski regarding contracts and Verified Complaint draft; Legal research into preliminary injunction and State misappropriation of trade secrets law; Emails from/to S. Magee and J. Gutkoski regarding trade secret law; Edit Memorandum in Support of Motion for Preliminary Injunction and Expedited Discovery; Emails from/to J. Gutkoski and M. Mitchell regarding documents ; Meeting with J. Gutkoski regarding edits to Verified Complaint; Review	5.90
		contracts for Verified Complaint draft	
4/02/21	JTG	Revise complaint; further detail and fact development with client; revise brief.	10.40
4/02/21	PKZ	Meeting with J. Gutkoski regarding filing the Complaint and Motions for Preliminary Injunction and Expedited Discovery; Edit and add comments to Verified Complaint in preparation for client call and email to S. Magee and J. Gutkoski; Research service of process and email to S. Magee regarding serving the individual defendants; Prepare for call to federal clerk's office Draft federal civil action cover sheet; Edit Memorandum in Support of Motion for Preliminary Injunction and Expedited Discovery Review and annotate KPM Employee Handbook; Call to Massachusetts District Court	6.80
		Research procedure for filing complaint and motions for preliminary injunction and expedited discovery; Edit Motion for Preliminary Injunction; Draft Motion for Expedited Discovery Draft Proposed Order (expedited discovery); Draft Proposed Order (preliminary injunction)	
4/03/21	JTG	Complete complaint; revise brief and motions.	8.80
4/04/21	SRM	Review updated factual information from client regarding complaint and employees.	1.00
4/05/21	SRM	Finalize and file with Court Verified Complaint; review and comment on motion for preliminary injunction and supporting memorandum; edit motion for expedited discovery; telephone conferences with P. Zacharakis regarding same; research regarding issues for preliminary injunction motion.	8.90

Invoice #: 244587 May 11, 2021

Date	Atty	Description	Hours
4/05/21	JTG	Complete and file complaint; revise brief and motion papers.	12.70
4/05/21	PKZ	Review injunctive relief contract language in defendant agreements and send to S. Magee and J. Gutkoski with Research Memo; Research and draft cause of action Review and edit complaint and prepare exhibits; Meeting with S. Magee and J. Gutkoski regarding filing Verified Complaint and Motions for Preliminary Injunction and Expedited Discovery; Draft Civil Category Form Edit Civil Action Cover Sheet and emails from/to S. Magee; Edit Civil Category Form and email to S. Magee with comments; Final review of Complaint package and email to S. Magee and J. Gutkoski; Prepare for meeting with J. Gutkoski and final edits to Verified Complaint package; Meeting with J. Gutkoski regarding final Verified Complaint package Edit cover letters to Defendants for service and email to K. Olson Email to S. Magee and J. Gutkoski regarding service packages; Email to S. Magee and J. Gutkoski regarding updated Memorandum in Support of Motion for Preliminary Injunction to exclude Expedited Discovery; Meeting with J. Gutkoski regarding Memorandum in Support of Preliminary Injunction; Legal research for Memorandum in support of Preliminary Injunction and email to S. Magee and J. Gutkoski; Legal research for preliminary injunctive relief	8.65
4/06/21	SRM	Multiple revisions of edits to motion for preliminary injunction, expedited discovery, proposed orders, and brief in support of motions; file with court same; numerous emails and calls with P. Zacharakis and J. Gutkoski regarding same.	5.10
4/06/21	JTG	Finalize memo of law, motion papers; service issue and court interactions.	14.30
4/06/21	PKZ	Final edits to Memorandum of Law in Support of Motion for Preliminary Injunction and Expedited Discovery; Prepare complaint citations for Memorandum in Support of Preliminary Injunction; Edit Memorandum in Support of Preliminary Injunction; Meeting with J. Gutkoski regarding Memorandum of Law in Support of Motion to Preliminary Injunction and Motion for Preliminary Injunction; Email to S. Magee and J. Gutkoski regarding injury; Edit Memorandum of Law in Support of Motion for Preliminary Injunction and email to S. Magee and J. Gutkoski; Edit Motion for Preliminary Injunction and Proposed Order for Preliminary Injunction; Edit memorandum in support of Motion for Preliminary Injunction; Research corporate defendants' registered agent addresses for service and email to S. Magee and J. Gutkoski Emails from/to J. Gutkoski and K. Olson regarding finalizing draft for the client; Edit Memorandum of Law in Support of Motion for Preliminary Injunction; Edit Motion for Preliminary Injunction and Emergency Motion for Expedited Discovery	6.40
4/07/21	JTG	Attention to various logistical issues in connection with filing.	1.40

Invoice #: 244587 May 11, 2021

Date	Atty	Description	Hours
4/07/21	PKZ	preparation for D. Kline deposition; Meeting with J. Gutkoski regarding case status and next steps	2.55
4/08/21	PKZ	Review S. Magee deposition outline and add comments; Attention to document requests for expedited discovery	.80
4/09/21	PKZ	File Notice of Appearance	.10
4/13/21	SRM	Attention to service on defendants; emails with J. Gutkoski and P. Zacharakis regarding same.	.50
4/13/21	PKZ	Confirm receipt of service packages and email to J. Gutkoski and S. Magee	.20
4/14/21	SRM	Attention to status of service of process; telephone conference with J. Marrow regarding	.50
4/16/21	SRM	Attention to service of process; emails with P. Zacharakis regarding same.	.70
4/20/21	SRM	Prepare edits to affidavit of service; conference with P. Zacharakis regarding same; emails with opposing counsel regarding service and introduction to case.	1.30
4/20/21	PKZ	Review and edit Affidavit of Service and email to S. Magee; Draft Notice of Deposition (M. Gajewski); Email to S. Magee regarding Notices of Deposition; Draft Request for Production of Documents to Defendants Email from/to S. Magee regarding Affidavit of Service; Draft Notice of Deposition (M. Gajewski); Email to S. Magee regarding Notices of Deposition; Draft Request for Production of Documents to Defendants; Email to S. Magee and J. Gutkoski regarding status of service on Defendants; Draft and edit Affidavit of Service and prepare all exhibits; Email to S. Magee regarding draft Affidavit of Service; Meeting with S. Magee regarding serving defendants and Affidavit of Service	4.05
4/21/21	SRM	Conference call with defendants' counsel regarding service issues, expedited discovery schedule; telephone conference with J. Gutkoski regarding same; review service status.	1.20
4/21/21	PKZ	Email from/to K. Olson regarding , The Innovative Technologies Group & Co., Ltd., and G. Israelson Edit Affidavit of Service and email to S. Magee and J. Gutkoski with comments Edit Request for Production of Documents Call with defense counsel, J. Gutkoski and S. Magee, follow up call with J. Gutkoski and S. Magee and edit notes form calls Open and review returns of service for Blue Sun and The Innovative Technologies Group & Co., Ltd. (Complaint and Initial Motion Paper)	1.95
4/22/21	SRM	Telephone conference with client regarding discovery timing and update regarding call with defense counsel; emails with opposing counsel and J. Gutkoski regarding same; update to J. Marrow regarding	.70

Invoice #: 244587 May 11, 2021

Date	Atty	Description	Hours
4/22/21	PKZ	Draft Answer to Amended Complaint; Attend client meeting to discuss and prepare summary of call; Email to J. Gutkoski and S. Magee regarding Affidavit of Service update	2.15
4/23/21	SRM	Telephone conference with defendants' counsel regarding expedited discovery; review draft stipulation regarding extension of time; prepare for same; telephone conference with J. Gutkoski regarding expedited discovery; review updates from client; provide update to J. Marrow.	2.10
4/23/21	PKZ	Edit Affidavit of Service and email to S. Magee and J. Gutkoski with comments; Call with J. Gutkoski, S. Magee and opposing counsel regarding expedited discovery schedule, edit notes from call and email to/from S. Magee and J. Gutkoski	1.40
4/26/21	SRM	Finalize and file affidavit of service; emails with P. Zacharakis and J. Gutkowski regarding same.	1.10
4/26/21	PKZ	Finalize cover letter for Affidavit of Service and email to opposing counseling enclosing complete Affidavit of Service package; Edit Affidavit of Service and update exhibits; Draft letter to Opposing Counsel regarding Affidavit of Service	1.65
4/27/21	SRM	Telephone conference with P. Zacharakis and J. Gutkoski regarding expedited discovery; emails with clerk review information from P. Zacharakis	.60
4/27/21	PKZ	Email from/to J. Gutkoski regarding statutory requirements; Call with S. Magee and J. Gutkoski regarding non-compete research and contacting the clerk; Review and update notes from call with S. Magee and J. Gutkoski; Non-compete research and email summary/findings to S. Magee and J. Gutkoski	1.20
4/28/21	SRM	Review stipulation regarding extension of time; review notice of motion hearing regarding motion for expedited discovery.	.20
4/28/21	PKZ	Research and summarize rules rules regarding timeline of discovery conferences and initial disclosures and email to J. Gutkoski	1.60

TOTAL PROFESSIONAL SERVICES

\$ 63,989.50

EXPENSES

Date	Description	Amount
4/01/21	Thomson Reuters - West, Online research, 5/5/2021	29.68
4/01/21	Thomson Reuters - West, Online research, 5/5/2021	487.44

TOTAL EXPENSES

\$ 517.12

MATTER TOTAL

\$ 64,506.62

Invoice #: 244587 May 11, 2021

TOTAL THIS INVOICE

\$ 65,542.12

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 9 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 244587 May 11, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
242803	4/09/21	73,021.50	.00.	73,021.50

Previous Balance \$73,021.50

Total Due This Invoice \$65,542.12

TOTAL BALANCE DUE \$ 138,563.62

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 55971 June 15, 2021 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$96,070.00

TOTAL DUE THIS BILL: \$96,070.00

PRIOR BALANCE DUE: \$15,015.00

TOTAL NOW DUE: \$111,085.00

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number: 55971

June 15, 2021

File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH May 31, 2021

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u> 05/03/2021	<u>Atty</u> JTG	<u>Description</u> CORRESPONDENCE RE:	<u>Time</u> 0.70 Hrs	<u>Rate</u> 650.00 /hr
		ATTENTION TO PLEADINGS AND SUPPLEMENTATION ISSUES.		
05/04/2021	JTG	CONFIRM SERVICE ISSUES; CASE TIME LINE.	0.80 Hrs	650.00 /hr
05/06/2021	JTG	ATTENTION TO DISCOVERY QUESTIONS AND RESULTS OF INTERNAL INVESTIGATION.	0.60 Hrs	650.00 /hr
05/07/2021	JTG	CORR. W/ CLIENT RE: ; ATTENTION TO DISCOVERY REQUESTS	1.60 Hrs	650.00 /hr
05/10/2021	JTG	ATTENTION TO PROTECTIVE ORDER, DISCOVERY REQUESTS AND LIKELY DISCOVERY FROM OPPOSING COUNSEL; ATTENTION TO CASE SCHEDULE RULES; CONF. CALL WITH TEAM; REVIEW DRAFT REQUESTS.	5.20 Hrs	650.00 /hr
05/11/2021	JTG	CORR. W/ OPPOSING COUNSEL; ATTENTION TO RULES AND LAW RE:	2.80 Hrs	650.00 /hr
05/12/2021	JTG	PREPARE AND CONDUCT CONFERENCE WITH OPPOSING COUNSEL RE: PLANNED MOTIONS; ATTENTION TO POTENTIAL GROUNDS FOR MOTIONS.	2.20 Hrs	650.00 /hr
05/13/2021	JTG	INITIAL REVIEW OF MULTIPLE MOTIONS TO DISMISS, AFFIDAVITS AND SUPPORTING MATERIALS FILED BY DEFENDANTS; TEAM AND CLIENT	7.70 Hrs	650.00 /hr

CESARI AND MCKENNA, LLP		BILL NUMBE	ER 55971	
05/14/2021	JTG	EMAILS. TEAM CALL RE: MOTIONS; FURTHER REVIEW OF FILED MATERIALS AND SCHEDULE; REVIEW CITED CASES AND STATUTES; CALL WITH CLIENT; REVIEW RESEARCH RESULTS FROM TEAM; ATTENTION TO IMPACT ON UPCOMING HEARING.	6.90 Hrs	650.00 /hr
05/15/2021	JTG	ATTENTION TO RESPONSE TO DEFENDANTS' MOTION TO STAY AND OPPOSITION TO OUR MOTION FOR EXPEDITED DISCOVERY; REVIEW CASES CITED BY DEFENDANTS.	4.80 Hrs	650.00 /hr
05/16/2021	JTG	CONTINUED WORK ON OPPOSITION TO STAY MOTION; BEGIN PREPARATION FOR ORAL ARGUMENT AND HEARING.	7.10 Hrs	650.00 /hr
05/17/2021	JTG	WORK WITH TEAM AND CLIENTS TO FINALIZE AND FILE DRAFT OPPOSITION; PREPARE FOR ORAL ARGUMENT AND HEARING ON EXPEDITED RELIEF.	14.20 Hrs	650.00 /hr
05/18/2021	JTG	FINAL PREP FOR AND ARGUE HEARING FOR EXPEDITED RELIEF; CALL WITH TEAM RE: NEXT STEPS; CALL W/B. MITCHELL.	10.80 Hrs	650.00 /hr
05/19/2021	JTG	EMAILS W/ ; PREPARE SUPPL. LETTER FILING WITH COURT; TEAM EMAILS; REVIEW ORDERS FORM THE COURT; PLAN FOLLOW ON STRATEGY; TEAM DISCUSSION; EMAILS TO CLIENT.	6.60 Hrs	650.00 /hr
05/20/2021	JTG	EMAILS WITH CLIENT RE: ; ATTENTION TO DISCOVERY REQUESTS; REVISE DRAFTS OF REQUESTS.	6.40 Hrs	650.00 /hr
05/21/2021	JTG	DISTRIBUTE DRAFT DISCOVERY REQUESTS; OBTAIN CLIENT FEEDBACK; CALL WITH CLIENT; ATTENTION TO DEPOSITION STRATEGY; FINALIZE AND HAVE DISCOVERY SERVED.	6.80 Hrs	650.00 /hr
05/22/2021	JTG	REVIEW AND SEND AROUND DEFENDANTS' DISCOVERY REQUESTS; ATTENTION TO COLLECTION PLAN.	1.30 Hrs	650.00 /hr
05/23/2021 05/24/2021	JTG JTG	CLIENT AND TEAM EMAILS. CALL WITH CLIENT RE: COLLECTION AND PRODUCTION ; MULTIPLE RELATED EMAILS; ATTENTION TO OPPOSITION BRIEFS; ATTENTION TO PROTECTIVE ORDER OPTIONS; ATTENTION TO POTENTIAL	0.30 Hrs 8.40 Hrs	650.00 /hr 650.00 /hr

CESARI ANI	D MCK	ENNA, LLP	BILL NUM	BER 55971
		LITIGATION ANALYSIS; RELATED DISCUSSION WITH CASE ISSUES.	N	
05/25/2021	JTG	ATTENTION TO OPPOSITIONS; CALL WITH CLIENT RE: DOCUMENT SEARCH AND COLLECTION; RELATED EMAILS DRAFT MESSAGE FOR		650.00 /hr
05/26/2021	JTG	FURTHER QUESTION AND CHALLENG RE: DOCUMENT COLLECTION; COUR' ORDER RE: EXTENSION FOR OPPOSITIONS; GET VENDOR OPTION ATTENTION TO AUTHORITIES REGARDING CALL WITH CLIENT TE	T' NS;	650.00 /hr
05/27/2021	JTG	ATTENTION TO DISCOVERY FOLLOW QUESTIONS; ARRANGEMENTS WITH DISCOVERY VENDOR; TEAM CALL WIVENDOR. ATTENTION TO RESULTS COLLECTION EFFORTS TO DATE; WOON OPPOSITION OUTLINES TO DEFENDANTS' MOTIONS.	VUP 8.60 Hrs TTH DF	650.00 /hr
05/28/2021	JTG	COMPLETE ARGUMENT OUTLINES FOR ALL DEFENDANTS' MOTIONS AND MATERIALS; RESPOND TO CLIENT EMAILS; BEGIN INDIVIDUAL DEFENDANTS' OPPOSITION BRIEF.	OR 10.60 Hrs	650.00 /hr
05/29/2021	JTG	REVIEW CASES AND LEGAL AUTHORITIES RELATED TO DEFENDANTS' MOTIONS; WORK ON OPPOSITION; ATTENTION TO POTENTIAL DEPOSITION QUESTIONS	4.60 Hrs S.	650.00 /hr
05/30/2021	JTG	DRAFT OPPOSITION BRIEF; ATTENTIC TO ADDITIONAL DISCOVERY QUEST AND CORRESPONDENCE.	ON 6.10 Hrs	650.00 /hr
05/31/2021	JTG	REVIEW CASE LAW CITED BY DEFENDANTS ON CLAIMS; CONTINUE WORKING ON DRAFT OPPOSITIONS.	12.70 Hrs	650.00 /hr
			OTAL SERVICES:	\$96,070.00

SERVICES SUMMARY

Gutkoski, John T. 147.80 650.00 \$96,070.00

MATTER TOTAL: \$96,070.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 14 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

55971

TOTAL DUE THIS BILL:

\$96,070.00

BALANCE PRIOR STATEMENTS

55687 05/14/2021 \$15,015.00

PRIOR BALANCE DUE \$15,015.00

TOTAL NOW DUE: \$111,085.00

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

July 27, 2021

File Number

254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

Our records indicate that the following invoices are outstanding:

Invoice Number	Invoice Date	Balance Due
55971	06/15/21	\$96,070.00
56159	07/27/21	\$145,575.95

TOTAL DUE, PLEASE PAY THIS AMOUNT ...

\$241,645.95

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number 56159

July 27, 2021

File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$129,135.00

CURRENT DISBURSEMENTS: \$16,440.95

TOTAL DUE THIS BILL: \$145,575.95

PRIOR BALANCE DUE: \$96,070.00

TOTAL NOW DUE: \$241,645.95

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:

ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number:

56159

July 27, 2021

File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH June 30, 2021

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number

254002 0001

<u>Date</u> 06/01/2021	Atty JTG	Description REVISE CORP. DEFENDANTS' OPPOSITION; ATTENTION TO LAW; ATTENTION TO FILES; ATTENTION TO	Time 7.10 Hrs	<u>Rate</u> 650.00 /hr
06/02/2021	JTG	ADDITIONAL COMMENTS RE: CORPORATE DEFENDANTS' OPPOSITION; REVISE INDIVIDUAL DEFE'S OPPOSITION; ATTENTION TO DOCUMENT PRODUCTION; ADDITIONAL COMMENTS RE: CORPORATE DEFENDANTS' OPPOSITION; REVISE INDIVIDUAL DEFE'S OPPOSITION; ATTENTION TO DOCUMENT PRODUCTION	13.30 Hrs	650.00 /hr
06/03/2021	JТG	REVIEW ADDITIONAL CASES AND LEGAL AUTHORITIES; FINAL COMMENTS ON CORP DEF'S OPPOSITIONS; COMPLETE REVISIONS, OBTAIN COMMENTS AND INCORPORATE INTO INDIVIDUAL DEFS' MOTION OPPOSITION.	11.30 Hrs	650.00 /hr
06/04/2021	JTG	ATTENTION TO DOC PRODUCTION ISSUES; ANALYSIS OF POTENTIAL REPLY BRIEFS BY DEFS.	3.70 Hrs	650.00 /hr
06/06/2021	JTG	ATTENTION TO PROTECTIVE ORDER OPTIONS AND DISCOVERY ISSUES.	3.10 Hrs	650.00 /hr
06/08/2021	JTG	REVIEW OF NOTE AND CORR. AND MATERIALS; ATTENTION TO DOC. SEARCH RESULTS AND STRATEGIC CALLS; CORP. DEF'S REPLY REQUEST;	6.80 Hrs	650.00 /hr

CESARI AN	D MCKI	ENNA, LLP	BILL NUMBEI	R 56159
06/09/2021	JТG	ATTENTION TO REVIEW. REVIEW DRAFT RESPONSES TO DEFS' DOCUMENT REQUESTS, PROPOSED EDITS; ATTENTION TO PROTECTIVE ORDER; CONTINUE DOCUMENT SORTING; ATTENTION TO DEPOSITION SCHEDULE.	6.30 Hrs	650.00 /hr
06/10/2021	JTG	TEAM CORR.; REVIEW OF KEY EMAILS AND DOCS. RELATED TO INDIVIDUAL DEFENDANTS' CONDUCT; NOTES FOR DEPOS; CONTINUE DRAFTING PROTECTIVE ORDER.	5.60 Hrs	650.00 /hr
06/11/2021	JТG	COMPLETE AND FINALIZE DISCOVERY RESPONSES AND OBJECTIONS; COMPLETE AND DISTRIBUTE PROTECTIVE ORDER TO DEFENDANTS; ATTENTION TO KEY DOCUMENTS IDENTIFIED BY TEAM REVIEW; EMAILS WITH CLIENT; REVIEW DEFS' OBJECTION TO OUR DOCUMENT REQUESTS.	12.20 Hrs	650.00 /hr
06/12/2021	JTG	COMMENTS FROM INDIVIDUAL DEFS' COUNSEL RE: PROTECTIVE ORDER; ATTENTION TO DEFS' DOCUMENT PRODUCTIONS.	1.40 Hrs	650.00 /hr
06/14/2021	JTG	ATTENTION TO PRODUCTION OBJECTIONS; REVIEW INITIAL KEY DOCUMENTS PRODUCED AND COMPARE TO COMPLAINT TIMELINE; TEAM STRATEGY CALL FPR REVIEW AND ORGANIZATION OF PRODUCED DOCUMENTS.	6.90 Hrs	650.00 /hr
06/15/2021	GMM	CALL WITH JTG DISCUSSING POSSIBLE REVIEWING CLIENT	0.50 Hrs	495.00 /hr
06/15/2021	JТG	REVIEW MATERIALS AND CONDUCT STRATEGY CALL WITH QUESTIONS FOR CLIENT; ATTENTION TO REVIEWED DOCUMENT SUMMARIES AND EXAMPLES; NOTES FOR DEPOSITIONS; FINALIZE PROTECTIVE ORDER; IDENTIFY COMPLAINTS WITH DEFS' DOCUMENT PRODUCTIONS AD MEET AND CONFER SESSIONS WITH DEFENSE COUNSEL.	8.70 Hrs	650.00 /hr
06/16/2021	GMM	REVIEWING CLIENT AND INCLUDED; PREPARING QUESTIONS RELATED TO ; EMAIL CORRESPONDENCE WITH JTG.	1.20 Hrs	495.00 /hr

CESARI AN	D MCKI	ENNA, LLP	BILLNUMBE	R 56159
06/16/2021	JTG	CONTINUE ATTENTION TO KEY DOCS PRODUCED BY DEFENDANTS AND ADDRESS DISCOVERY CONCERNS.	4.30 Hrs	650.00 /hr
06/17/2021	JTG	STATUS CALL WITH CLIENT REPS.; ATTENTION TO DISCOVERY DISPUTES AND DEFENDANTS; REVIEW REPLY BRIEFS ON MOTIONS TO DISMISS AND AUTHORITIES CITED; RELATED CORR. WITH CLIENTS.	6.90 Hrs	650.00 /hr
06/18/2021	JТG	BEGIN PREPARING FOR MOTIONS HEARING; ASSEMBLE AND REVIEW RELATED CASES AND CITED AUTHORITIES; ATTENTION TO REVIEW OF DOCS PRODUCED -	4.80 Hrs	650.00 /hr
06/19/2021	JTG	CONTINUE HEARING PREPARATION.	3.10 Hrs	650.00 /hr
06/20/2021	JTG	STUDY OF	7.80 Hrs	650.00 /hr
06/21/2021	JTG	AND HEARING PREPARATION. PREPARE FOR AND ATTEND MEET AND	10.70 Hrs	650.00 /hr
06/22/2021	JTG	CONFER WITH ENTITY DEFENDANTS; TEAM STRATEGY DISCUSSION; COMPLETE PREPARATION AND ARGUE AGAINST MOTIONS TO DISMISS; FOLLOW UP CALL WITH E. OLSON; ATTENTION TO DOC. PREPARE FOR AND LEAD MEET AND	5.80 Hrs	650.00 /hr
00, 22, 2021)10	CONFER CALL WITH INDIVIDUAL DEFENDANTS REGARDING THEIR DOCUMENT PRODUCTION; RELATED CORR.; ATTENTION TO DEPOSITION TOPICS AND DOCS PRODUCED.	3.00 1110	030.00 / 11
06/23/2021	GMM	CONFERENCE CALL WITH CLIENT REGARDING REVIEW CLIENT	1.00 Hrs	495.00 /hr
06/23/2021	JTG	PREPARE FOR AND CALL WITH CLIENT RE: FOLLOW UP DISCUSSION RE: DISCOVERY OPTIONS; DEPOSITION PREPARATION; DISTRIBUTE DRAFT CATEGORIES FOR COMMENT.	6.90 Hrs	650.00 /hr
06/24/2021	JTG	DEPOSITION PREPARATION, NOTICE AND SCHEDULE.	5.40 Hrs	650.00 /hr
06/25/2021	JTG	TEAM MEETING FOR DOCUMENTS AND DEPOSITIONS; CONTINUE ATTENTION TO KEY DOCS; CORR. FROM DEF. COUNSEL; DEPOSITION NOTICES FROM	6.60 Hrs	650.00 /hr
		3 of 5		

CESARI AND MCKENNA, LLP						BILL NUM	BER	56159
06/26/2021 06/27/2021	JTG JTG	DEFENDAN' REVIEW DOCORR. WITH ATTENTION DOCUMENT	CUMENTS CLIENT R TO CATE	E:	;	4.80 Hrs 5.70 Hrs	650.00 650.00	
06/28/2021	GMM	REVIEW CLI TOPICS AND RELATED TO CORRESPON	ENT POTENTI DEPOSIT	TONS; EMA	ONS	3.30 Hrs	495.00	/hr
06/28/2021	JTG	TEAM CALL: AND DISCOV WITNESS; RE DISCUSSION	RE: DEPOS VERY; VID: ELATED ST	SITIONS, EX EO CONF. ' 'RATEGY	WITH	10.20 Hrs	650.00	/hr
06/29/2021	JTG	CONTINUE I AND QUEST OF DOCS FO	DEPOSITIONS OUT	ON PREPAR LINE AND	ATION	11.80 Hrs	650.00	/hr
06/30/2021	JTG	FINAL PREP. REVIEW OF EXHIBIT SEI	FINAL PREP. FOR GAJEWSKI DEPOSITION; REVIEW OF ALL HOT DOCS AND FINAL EXHIBIT SELECTIONS; DECIDE WHAT TO RESERVE FOR ADDITIONAL					/hr
			10.		TOTALSER	VICES:	\$129,135.0	0
SERVICES S	UMMAI	RY						
McCloskey, G	G. Matthew	W	6.00	495.00	\$2,970.00			
Gutkoski, John T.			194.10	650.00	\$126,165.00		ν,	
DISBURSEMENTS:								
VERITEXT LEGAL SOLUTIONS; Video Services 5138491 \$673.00 Target Litigation Consulting, Inc.; CONSULTING FEES \$15,767.95								
215947/9/21								

TOTAL DISBURSEMENTS:

\$16,440.95

MATTER TOTAL:

\$145,575.95

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 21 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

56159

TOTAL DUE THIS BILL:

\$145,575.95

BALANCE PRIOR STATEMENTS

55971 06/15/2021

\$96,070.00

PRIOR BALANCE DUE

\$96,070.00

TOTAL NOW DUE:

\$241,645.95

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 56261 August 17, 2021 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$138,019.00

CURRENT DISBURSEMENTS: \$1,176.16

TOTAL DUE THIS BILL: \$139,195.16

PRIOR BALANCE DUE: \$145,575.95

TOTAL NOW DUE: \$284,771.11

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 56261 August 17, 2021 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH August 9, 2021

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	Description	<u>Time</u>	<u>Rate</u>
07/01/2021	JTG	FINAL PREP AND REVIEW OF POTENTIAL	14.90 Hrs	650.00 /hr
		EXHIBITS FOR AND CONDUCT		
		DEPOSITION OF R. GAJEWSKI; EMAILS FROM TEAM AND CLIENT; FOLLOW UP		
		NOTES FOR ADDITIONAL DEPOSITIONS.		
07/02/2021	JTG	LOGISTICS FOR NEXT WEEK'S	7.80 Hrs	650.00 /hr
017 027 2021	Jio	DEPOSITIONS; ATTENTION TO BLUE SUN	7.00 1110	000100 / 111
		DEPO PREP,; ATTENTION TO DEFENSIVE		
		DEPOSITION ISSUES; TEAM CALL; CALL		
		WITH CLIENT; REVIEW PRODUCED		
		EMAILS AND DOCUMENTS RELATED TO		
		KEY ISSUES: CONTINUE HEARING PREPARATION.		
07/03/2021	JTG	DEPOSITION PREP AND REVIEW	5.60 Hrs	650.00 /hr
07/03/2021	J10	MATERIALS	5.00 1113	030.00 / 111
07/04/2021	JTG	DEPOSITION PREPARATION	4.80 Hrs	650.00 /hr
07/05/2021	JTG	PREPARE FOR AND ATTEND	11.20 Hrs	650.00 /hr
		; PREPARE FOR		
		BLUE SUN DEPOSITION		
07/06/2021	JTG	FINAL PREPARATION FOR AND DEPOSE	15.40 Hrs	650.00 /hr
07/00/2021	J10	BLUE SUN (LUCAS); TEAM	13.40 1118	030.00 / 111
		CORRESPONDENCE.		
07/07/2021	JTG	ATTENTION TO ISSUES;	6.80 Hrs	650.00 /hr
	J	CORR. AND CALL RE:		
		REVIEW MATERIAL FOR ITG DEP.;		
		PREPARE		
		ITG.		

CESARI AN	D MCK	ENNA, LLP	BILL NUMBE	R 56261
07/08/2021	JTG	ATTENTION TO FILES AND ; REVIEW E. OLSEN ROUGH TRANSCRIPT; PREPARE FOR AND LEAD DEPOSITION PREP SESSION ; ATTENTION TO DETAILS LEARNED CALL WITH E. OLSEN; ADDITIONAL INPUT FOR ITG DEPO.; REVIEW	10.40 Hrs	650.00 /hr
07/09/2021	JTG	BEGIN AND FOR HEARING AND BRIEF; ATTENTION TO SCHUMANN DEPOS. RESULTS; REVIEW ROUGH TRANSCRIPTS.	4.70 Hrs	650.00 /hr
07/10/2021	JTG	ATTENTION TO EVIDENCE RE: REVIEW CASES.	4.40 Hrs	650.00 /hr
07/11/2021	JTG	EMAILS WITH CLIENT; REVIEW CORR. RELATED TO FILES; REVIEW	3.40 Hrs	650.00 /hr
07/12/2021	JTG	PREPARE FOR AND CALL WITH E. OLSEN; CHECKLIST TO TEAM; ATTENTION TO PROOF REGARDING ATTENTION TO EVIDENCE FOR HEARING; ATTENTION TO AGREEMENTS.	5.90 Hrs	650.00 /hr
07/13/2021	JTG	TRACK RELATED TO FROM VARIOUS DEFENDANTS; OUTLINE ARGUMENTS; SET UP TEAM CALL ; PULL CITED CASES.	8.80 Hrs	650.00 /hr
07/14/2021	JTG	COMMUNICATIONS RE: REVIEW CASE LAW FOR ORAL ARGUMENT; CONTINUE REVIEW AND SELECTIONS OF REVIEW OF FINAL TRANSCRIPTS; ATTENTION TO POTENTIAL ISSUES AND RELATED TESTIMONY; ATTENTION TO ARGUMENTS; PREPARE FOR ORAL ARGUMENT.	9.40 Hrs	650.00 /hr
07/15/2021	JТG	FURTHER ATTENTION TO ARGUMENTS RE: REVIEW RELATED TESTIMONY AND EVIDENCE; CONTINUE TO PREPARE FOR ORAL ARGUMENT; ORDER ON MOTION	13.40 Hrs	650.00 /hr

CESARI AN	D MCK	BILL NUMBE	R 56261	
		TO DISMISS ISSUED; REVIEW VERIFIED COMPLAINT; SUMMARY FOR CLIENT; TEAM EMAILS; ADAPT ARGUMENT TO MOTION REVIEW INDIVIDUAL DEFENDANTS' ; REVIEW PROPOSED ORDER OF INJUNCTION.		
07/16/2021	JTG	FINAL PREPARATION FOR AND THEN ARGUE MOTION FOR PRELIMINARY INJUNCTION; FOLLOW UP DISCUSSIONS WITH TEAM AND CLIENT; PLAN BRIEF OUTLINE AND IDENTIFY NEEDED RESEARCH IN LIGHT OF DEFENDANTS' ARGUMENTS AT HEARING.	9.30 Hrs	650.00 /hr
07/18/2021	JTG	OUTLINE BRIEF SUPPLEMENTING PRIOR SUBMISSIONS; REVIEW PRIOR BRIEFS SUBMITTED BY BOTH SIDES AND DISMISSAL ARGUMENTS AND THEMES; ATTENTION TO EMAIL EVIDENCE; REVIEW CASES AND STANDARDS.	6.70 Hrs	650.00 /hr
07/19/2021	JТG	COMPLETE BRIEF OUTLINE, DISTRIBUTE TO TEAM FOR INPUT AND ASSIGN TASKS REGARDING SECTIONS AND RELATED LEGAL AND FACTUAL RECORD RESEARCH; BEGIN TO DRAFT.	7.80 Hrs	650.00 /hr
07/20/2021	JTG	DRAFT BRIEF; TEAM QUESTIONS AND ATTENTION TO KEY CASES.	10.10 Hrs	650.00 /hr
07/21/2021	JТG	ATTEND TO POTENTIAL INVESTIGATION; EMAILS W/ ; CONTINUE DRAFTING PI SUPPLEMENTAL BRIEF; NOTICE FROM COURT; ATTENTION TO REVENUE LOSS AND HARM ISSUES.	12.30 Hrs	650.00 /hr
07/22/2021	JTG	EDIT BRIEF SECTIONS WRITTEN BY TEAM AND THEN INCORPORATE REVISED SECTIONS INTO OVERALL DRAFT; REVIEW CASES CITED; COMPLETE DRAFT; REVISE ENTIRE BRIEF.	15.20 Hrs	650.00 /hr
07/23/2021	JТG	COMMENTS FROM TEAM AND CALL WITH CLIENT; FINALIZE BRIEF AND WORK WITH TEAM TO FINALIZE AND FILE ALL SUPPORTING MATERIALS INCLUDING REVISED PROPOSED FORM OF ORDER	8.60 Hrs	650.00 /hr

495.00 /hr

1.70 Hrs

AND DECLARATIONS.

CESARI ANI	CESARI AND MCKENNA, LLP						IBER	56261
07/26/2021	JTG	CLEAN UP OF	F VARIOUS	S ISSUES P	OST	1.20 Hrs	650.0	0 /hr
		FILINGS.			•			
07/27/2021	GMM	CONTINUINO				1.50 Hrs	495.0	0 /hr
		DEPOSITION		RIPT AND I	G EMAII			
		SUMMARY FO			O EMITIE			
07/27/2021	JTG	ATTENTION	T <u>o avail</u>	ABLE		0.90 Hrs	650.0	0 /hr
		AND SPECIFI						
07/29/2021	JTG	LETTER FROM			NE D	4.20 Hrs	650.0	0 /hr
		DEFENDANT GAJEWSKI HA						
		ANSWER FILE			**			
		DEFENDANT	•					
		MEDIATION :						
		JUDGE; DRAF SUMMARY TO	TI, KEVISE CLIENT	E AND SEN AND TEAI	M RE:			
		NEXT STEPS) OEIEIVI					
07/30/2021	JTG	INITIAL REVI				3.80 Hrs	650.0	0 /hr
		INJUNCTION MATERIAL FI						
		DEFENDANT						
		CITED.	·					
07/31/2021	JTG	BEGIN SUMM	IARY; PLA	N REPLY I		2.90 Hrs	650.0	
					TOTAL SE	RVICES:	\$138,019.	00
SERVICES S	UMMAI	RY						
McCloskey, G	. Matthe	W	3.20	495.00	\$1,584.00			
Gutkoski, Joh	n T.		209.90	650.00	\$136,435.00			
DISBURSEN	MENTS	:						
Target Litigat - Invoice #21		sulting, Inc.; CON 09/2021	NSULTING	FEES	\$1,176.16			
DISBURSEN Target Litigat	MENTS:	sulting, Inc.; CON			. ,			

TOTAL DISBURSEMENTS: \$1,176.16

\$139,195.16 **MATTER TOTAL:**

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 27 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

56261

TOTAL DUE THIS BILL:

\$139,195.16

BALANCE PRIOR STATEMENTS

56159 07/27/2021 \$145,575.95

PRIOR BALANCE DUE \$145,575.95

TOTAL NOW DUE: \$284,771.11



One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 56444 September 24, 2021 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$74,685.00

CURRENT DISBURSEMENTS: \$725.00

TOTAL DUE THIS BILL: \$75,410.00

PRIOR BALANCE DUE: \$284,771.11

TOTAL NOW DUE: \$360,181.11

Wiring Information

CESARI AND MCKENNA, LLP

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 56570 October 8, 2021 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$61,100.00

TOTAL DUE THIS BILL: \$61,100.00

PRIOR BALANCE DUE: \$214,605.16

TOTAL NOW DUE: \$275,705.16

Wiring Information: Cesari and McKenna, LLP Boston Private Bank & Trust Co.

--Eric

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 56570 October 8, 2021 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$61,100.00

TOTAL DUE THIS BILL: \$61,100.00

PRIOR BALANCE DUE: \$214,605.16

TOTAL NOW DUE: \$275,705.16

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 56570 October 8, 2021 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH September 30, 2021

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	Description	<u>Time</u>	<u>Rate</u>
09/01/2021	JTG	CALLS WITH CLIENT RE: ; REVIEW DRAFTS OF OUR OFFER; ATTENTION TO CLARIFICATION/RECONSIDERATION; ATTENTION TO DISCOVERY SCHEDULE AND LIMITATIONS	4.30 Hrs	650.00 /hr
09/02/2021	JTG	ATTENTION TO AND CORRESPONDENCE W/ OPPOSING COUNSEL RE: DISCOVERY SCHEDULE; ATTENTION TO CLIENT QUESTIONS; REPORT TO MEDIATOR; REVIEW PI LANGUAGE CHALLENGED BY MOTION FOR CLARIFICATION; ATTENTION TO IN DISCOVERY PLEADINGS.	5.60 Hrs	650.00 /hr
09/03/2021	JТG	EMAIL EXCHANGES WITH OPPOSING COUNSEL RE: SCHEDULE AND DISCOVERY LIMITS; EMAILS WITH TEAM RE: SAME.	2.80 Hrs	650.00 /hr
09/07/2021	JТG	CONTINUED BACK AND FORTH WITH OPPOSING COUNSEL RE: DISCOVERY LIMITS; ATTENTION TO RESEARCH FROM P. ZACHARAKIS; WORK ON OPPOSITION TO MOTION FOR CLARIFICATION.	7.70 Hrs	650.00 /hr
09/08/2021	JТG	RECEIVE ENTITY DEFENDANTS' PROPOSED CHANGES TO JOINT STATEMENT; RELATED TEAM EMAILS; FINALIZE AND HAVE FILED; ATTENTION TO STATUS; ATTENTION TO	6.30 Hrs	650.00 /hr

CESARI AND MCKENNA, LLP			BILL NUMBE	R 56570
09/09/2021	JTG	OPPOSITION TO MOTION. EMAILS RE: ATTENTION TO OPPOSITION TO CLARIFICATION AND ATTENTION TO ; REVISE DRAFT OF INITIAL DISCLOSURES.	5.60 Hrs	650.00 /hr
09/10/2021	JTG	FURTHER ATTENTION TO OUR INITIAL DISCLOSURES; CONTINUE DRAFTING OPPOSITION TO MOTION FOR CLARIFICATION.	8.80 Hrs	650.00 /hr
09/11/2021	JTG	REVISE, FINALIZE AND DISTRIBUTE DRAFT OPPOSITION TO MOTION FOR CLARIFICATION.	8.40 Hrs	650.00 /hr
09/12/2021	JTG	COMMENTS AND THOUGHTS ON DRAFT OPPOSITION BRIEF; REVIEW ORDERS FROM COURT ; QUESTIONS ON INITIAL DISCLOSURES FROM PLAINTIFF'S SIDE.	4.10 Hrs	650.00 /hr
09/13/2021	JTG	FINALIZE OPPOSITION AND HAVE FILED; FINAL COMMENTS ON INITIAL DISCLOSURES; REVIEW DEFENDANTS' JOINT INITIAL DISCLOSURES; EMAILS WITH CLIENT	2.90 Hrs	650.00 /hr
09/14/2021	JTG	REVIEW SETTLEMENT COUNTEROFFER; RELATED TEAM AND CLIENT EMAILS.	1.60 Hrs	650.00 /hr
09/15/2021	JTG	TEAM DISCUSSIONS RE: SETTLEMENT COUNTEROFFER; ATTENTION TO REVITALIZED DISCOVERY OPTIONS AND PROCEEDING WITH THE CASE IN CHIEF.	2.90 Hrs	650.00 /hr
09/16/2021	JTG	CALL WITH CLIENT RE; NEXT DISCOVERY STEPS AND ATTENTION TO TEAM DISCUSSION RE: DISCOVERY; REVIEW PRIOR REQUESTS AND RESPONSES; ATTENTION TO ISSUES SET ASIDE FOR TIME DURING EXPEDITED DISCOVERY AND DEPOSITIONS; DRAFT AND SEND INQUIRY	5.70 Hrs	650.00 /hr
09/17/2021	JTG	TEAM STRATEGY CALL RE: NEXT DISCOVERY TASKS AND ASSIGNMENT OF RESPONSIBILITY; ATTENTION TO RESPONSE TO ATTENTION TO JOINT STATEMENT TO MEDIATOR.	2.10 Hrs	650.00 /hr
09/20/2021	JTG	QUESTIONS RE: PI ORDER; FINALIZE AND HAVE	4.70 Hrs	650.00 /hr

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CESARI AN	D MCK	ENNA, LLP	BILL NUMBEI	R 56570
		EXCHANGED AND FILED JOINT STATEMENT TO MEDIATOR; REVIEW DISCOVERY SUMMARY BY P. ZACHARAKIS; ATTENTION TO SEARCHES DONE IN DOCS PREVIOUSLY PRODUCED AND REMAINING ISSUES WITH THOSE PRODUCTIONS		
09/21/2021	JTG	ATTENTION TO DISCOVERY NEXT STEPS.	1.90 Hrs	650.00 /hr
09/22/2021	JТG	ATTENTION TO DEPOSITION FOLLOW-UP STEPS; REVIEW SELECTED PORTIONS FROM PRIOR TRANSCRIPTS.	4.50 Hrs	650.00 /hr
09/23/2021	JTG	ATTENTION TO NEW DISCOVERY REQUESTS; FOLLOW UP ON .	1.70 Hrs	650.00 /hr
09/24/2021	JTG	CONTINUED WORK ON NEW DISCOVERY REQUESTS.	1.30 Hrs	650.00 /hr
09/27/2021	JTG	DRAFT LANGUAGE FOR ; ATTENTION TO STATUS OF UNSEALING ORDER.	0.80 Hrs	650.00 /hr
09/29/2021	JTG	ATTENTION TO ; MULTIPLE EMAILS FROM CLIENT; REVIEW ORDER.	3.10 Hrs	650.00 /hr
09/30/2021	JТG	PREPARE FOR AND CONDUCT CALL WITH DETAILS; REVIEW SPREADSHEETS AND DETAILS OF DRAFT, REVIEW AND SEND DEMAND TO OPPOSING COUNSEL; REVIEW DRAFT DISCOVERY LETTER RE:	7.20 Hrs	650.00 /hr

REVIEW RULES REGARDING OBLIGATION TO SUPPLEMENT DISCOVERY.

TOTAL SERVICES: \$61,100.00

SERVICES SUMMARY

Gutkoski, John T. 94.00 650.00 \$61,100.00

MATTER TOTAL: \$61,100.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 34 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

56570

TOTAL DUE THIS BILL:

\$61,100.00

BALANCE PRIOR STATEMENTS

 56261
 08/17/2021
 \$139,195.16

 56444
 09/24/2021
 \$75,410.00

PRIOR BALANCE DUE \$214,605.16

TOTAL NOW DUE: \$275,705.16

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 57055 December 14, 2021 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$100,685.00

CURRENT DISBURSEMENTS: \$2,224.75

TOTAL DUE THIS BILL: \$102,909.75

PRIOR BALANCE DUE: \$123,110.30

TOTAL NOW DUE: \$226,020.05

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 57055 December 14, 2021 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH November 30, 2021

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	Atty	Description	<u>Time</u>	Rate
11/01/2021	JТĞ	ATTENTION TO MODELS AND APPROACHES; SET UP CALLS WITH POTENTIAL EXPERTS; REVIEW PROFILES; LEGAL RESEARCH ON	6.70 Hrs	650.00 /hr
		OPTIONS AND MEASUREMENTS.		
11/02/2021	JTG	PREPARE FOR AND CALL WITH STONETURN; ASSEMBLE CASE MATERIALS; ANSWER QUESTIONS; DISCUSSION OF POTENTIAL BUDGET APPROACHES; AND EXPERT TEAM COMPOSITION; DISCUSSION OF POTENTIAL REMEDIES; REVIEW ALTERNATIVE OPTIONS FOR EXPERTS	5.80 Hrs	650.00 /hr
		AND PRICES; ATTENTION TO DISCOVERY		
11/03/2021	JTG	AND DEPOSITION SCHEDULE. DEPOSITION LOGISTICS; FOLLOW UP ON DAMAGES EXPERT BUDGET OPTIONS; REVIEW MATERIALS FOR WITNESS DEPOSITIONS.	2.80 Hrs	650.00 /hr
11/04/2021	JTG	DEPOSITION SCHEDULING NEGOTIATION WITH OPPOSING COUNSEL; TEAM DISCUSSION RE: DEPOSITION PREPARATION AND EXHIBITS; CONTINUE REVIEW OF PRIOR DISCOVERY; RECEIVE AND REVIEW DISCOVERY ORDER FROM COURT.	6.20 Hrs	650.00 /hr
11/05/2021	JTG	DEPOSITION PLANNING.	1.40 Hrs	650.00 /hr
11/06/2021	JTG	REVIEW DRAFT BUDGET FROM STONETURN; RELATED CORRES.	2.30 Hrs	650.00 /hr

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 37 of 418

CESARI AND MCKENNA, LLP			BILL NUMBER 57		
11/08/2021	JTG	REVIEW AND EVALUATE CONTEMPT OPPOSITION AND SUPPORTING MATERIALS FROM DEFENDANTS; DISTRIBUTE TO TEAM;	5.60 Hrs	650.00 /hr	
		; DISTRIBUTE OPPOSITION TO CLIENT WITH RECOMMENDATIONS; DISTRIBUTE DISCOVERY ORDERS TO CLIENT.			
11/09/2021	JTG	TEAM DISCUSSIONS AND EMAILS RE: COURT ORDERS; ATTENTION TO POTENTIAL REPLY BRIEF AND POSSIBLE SUPPORT FROM UPCOMING DEPOSITIONS; REVIEW PRIOR MOTIONS FOR CLARIFICATION AND MATERIALS SUBMITTED; IDENTIFY DEFENDANTS' ARGUMENTS.	10.10 Hrs	650.00 /hr	
11/10/2021	JTG	EMAILS FROM CLIENT RE: ; BEGIN DRAFTING REPLY BRIEF; ATTENTION TO EILERT DEPOSITION.	9.80 Hrs	650.00 /hr	
11/11/2021	JTG	EMAILS WITH CLIENT RE: DETAILS; REPOSIITO REPLY BRIEF AND INCORPORATE DETAILS; CORR.W/ POTENTIAL DAMAGES EXPERT; ATTENTION TO EILERT DEPOSITION MATERIALS.	11.60 Hrs	650.00 /hr	
11/12/2021	JTG	DEPOSITION PREPARATION AND WORK ON REPLY BRIEF.	10.30 Hrs	650.00 /hr	
11/13/2021	JTG	DEPOSITION PREPARATION.	6.20 Hrs	650.00 /hr	
11/14/2021	JTG	REPLY DRAFT.	5.70 Hrs	650.00 /hr	
11/15/2021	J	COMPLETE REPLY BRIEF AND DISTRIBUTE TO TEAM AND CLIENT FOR COMMENTS AND INPUT; EILERT DEP. PREP.	12.60 Hrs	650.00 /hr	
11/16/2021	JTG	FINAL PREPARATION AND DEPOSE A. EILERT; REVIEW COMMENTS ON REPLY BRIEF.	13.20 Hrs	650.00 /hr	
11/17/2021	JTG	FINALIZE AND WORK WITH TEAM TO FILE REPLY BRIEF AND MATERIALS; ATTENTION TO GLENISTER MATERIALS AND POTENTIAL EXHIBITS.	9.20 Hrs	650.00 /hr	
11/18/2021	JTG	GLENISTER DEPOSITION PREPARATION; SELECTION OF POTENTIAL EXHIBITS; DETAILS OF	10.40 Hrs	650.00 /hr	
11/19/2021	JTG	FINAL PREPARATION FOR AND CONDUCT DEPOSITION OF R. GLENISTER.	11.70 Hrs	650.00 /hr	

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 38 of 418

CESARI AN	D MCK	BILL NUMBE	CR 57055	
11/22/2021	JTG	ATTENTION TO DAMAGES QUESTIONS AND TO SCHEDULE; ATTENTION TO LIMITATIONS AND PERMISSIONS IN DISCOVERY ORDER; PLANNING FOR REMAINING DEPOSITIONS; ATTENTION TO PLEADING DEADLINE.	4.80 Hrs	650.00 /hr
11/24/2021	JTG	FURTHER ATTENTION TO ISSUES.	3.30 Hrs	650.00 /hr
11/29/2021	JTG	EMAILS WITH CLIENT; ATTENTION TO EXPERT BUDGET; ATTENTION TO DISCOVERY ISSUES.	2.10 Hrs	650.00 /hr
11/30/2021	JTG	ATTENTION TO NEXT DISCOVERY ISSUES UNDER LIMITS SET BY COURT, TIMING AND INPUT FROM DAMAGES EXPERT; ATTENTION TO MOTION TO COMPEL; REVIEW MATERIALS	3.10 Hrs	650.00 /hr
		TOTALCER	OVICES. ¢1	00 695 00

TOTAL SERVICES: \$100,685.00

SERVICES SUMMARY

Gutkoski, John T. 154.90 650.00 \$100,685.00

DISBURSEMENTS:

Target Litigation Consulting, Inc.; CONSULTING FEES \$725.00 22037 10/11/21

Target Litigation Consulting, Inc.; CONSULTING FEES \$725.00 22174 11/07/21

Target Litigation Consulting, Inc.; CONSULTING FEES \$774.75 12/08/2021 22316

TOTAL DISBURSEMENTS: \$2,224.75

MATTER TOTAL: \$102,909.75

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 39 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

57055

TOTAL DUE THIS BILL:

\$102,909.75

BALANCE PRIOR STATEMENTS

56782 11/08/2021 \$123,110.30

PRIOR BALANCE DUE \$123,110.30

TOTAL NOW DUE: \$226,020.05

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 57216 January 7, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$72,735.00

CURRENT DISBURSEMENTS: \$1,832.60

TOTAL DUE THIS BILL: \$74,567.60

PRIOR BALANCE DUE: \$102,909.75

TOTAL NOW DUE: \$177,477.35

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number: 57216

January 7, 2022

File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH December 31, 2021

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	Atty	Description	<u>Time</u>	Rate
12/01/2021	JТĞ	ATTENTION TO NEXT LEVEL OF CORPORATE DISCOVERY AND FINANCIAL INFORMATION; CALL WITH CLIENT.	4.80 Hrs	650.00 /hr
12/02/2021	JTG	WORK WITH DAMAGES EXPERT RE: BUDGET AND RETENTION AGREEMENT; ATTENTION TO DRAFT DISCOVERY REQUESTS	5.40 Hrs	650.00 /hr
12/03/2021	JTG	INTRODUCTION OF CLIENT AND EXPERT AND RELATED CORR.; REVISE DISCOVERY LIST; ATTENTION TO AVAILABLE DEPOSITION OPTIONS.	5.70 Hrs	650.00 /hr
12/06/2021	JTG	TEAM EMAILS; ATTENTION TO NEW DISCOVERY.	6.10 Hrs	650.00 /hr
12/07/2021	JTG	CORR. WITH CLIENT AND EXPERT.	0.80 Hrs	650.00 /hr
12/08/2021	JTG	FINALIZE RETENTION LETTER FOR EXPERT; TEAM EMAILS; ATTENTION TO RELATED DISCOVERY.	4.20 Hrs	650.00 /hr
12/09/2021	JTG	SEND INFORMATION TO EXPERTS; ATTENTION TO PROTECTIVE ORDER; RELATED EMAILS.	2.60 Hrs	650.00 /hr
12/10/2021	JTG	REVIEW GLENNISTER TRANSCRIPT; BEGIN PREP FOR MOTION TO COMPEL HEARING.	4.40 Hrs	650.00 /hr
12/12/2021	JTG	HEARING PREP.	5.10 Hrs	650.00 /hr
12/13/2021	JTG	PLAN MEETING WITH DAMAGES EXPERTS; ASSEMBLE NOTES; CONTINUE HEARING PREP.	7.80 Hrs	650.00 /hr
12/14/2021	JTG	BRIEF REVIEW OF EILERT TRANSCRIPT; PREPARE FOR HEARING; RESCHEDULE	8.70 Hrs	650.00 /hr

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 42 of 418

CESARI AN	D MCK	ENNA, LLP	BILL NUM	BER 57216
12/15/2021	JTG	WITH EXPERTS. FINAL PREP FOR ATTEND AND ARGUE MOTION TO COMPEL AND MOTION FOR CLARIFICATION; FOLLOW UP	9.70 Hrs	650.00 /hr
12/16/2021	JTG	DISCUSSIONS WITH TEAM AND CLIENT. WORK WITH TEAM RE: SEARCH OF PRODUCED HARD DRIVES; PREPARE FOR AND LEAD TEAM CALL WITH DAMAGES EXPERTS; ATTENTION TO DISCOVERY MATERIALS TO PROVIDE TO EXPERTS.	7.10 Hrs	650.00 /hr
12/17/2021	JTG	REVIEW MOTION TO COMPEL ORDER AND REVISED INJUNCTION; CORR. WITH CLIENT; TEAM EMAILS; ATTENTION TO NEW ORDER.	6.80 Hrs	650.00 /hr
12/19/2021	JTG	REVISE DRAFT DISCOVERY AND SUBPOENA REQUESTS.	3.60 Hrs	650.00 /hr
12/20/2021	JTG	WORK WITH TEAM AND VENDOR ON DISCOVERY REVIEW, SUBPOENA AND REQUESTS.	7.30 Hrs	650.00 /hr
12/21/2021	JTG	CONTINUE WORK WITH VENDOR RE: REVIEW OF ELECTRONIC MATERIALS AND ON ADDITIONAL REQUESTS:	6.40 Hrs	650.00 /hr
12/22/2021	JTG	CONTINUE WITH ELECTRONIC DISCOVERY REVIEW ISSUES.	3.80 Hrs	650.00 /hr
12/23/2021	JTG	REVIEW REVISED SUBPOENA TO MICHELLE GAJEWSKI; REVIEW REPORT ON VIDEOS AND OTHER MEDIA PRODUCED; FOLLOW UP INSTRUCTIONS.	3.90 Hrs	650.00 /hr
12/28/2021	JTG	COMMENTS ON SUBPOENA AND OTHER REQUESTS.	4.50 Hrs	650.00 /hr
12/29/2021	JTG	FINALIZE AND WORK WITH TEAM TO SERVE SUBPOENA	2.10 Hrs	650.00 /hr
12/30/2021	JTG	CORR. WITH OPPOSING COUNSEL AND TEAM.	1.10 Hrs	650.00 /hr
		TOTAL S	ERVICES:	\$72,735.00

SERVICES SUMMARY

Gutkoski, John T. 111.90 650.00 \$72,735.00

DISBURSEMENTS:

VERITEXT; DEPOSITION TRANSCRIPTS \$1,832.60 12/14/2021

TOTAL DISBURSEMENTS: \$1,832.60

2 of 4

BILL NUMBER

57216

MATTER TOTAL:

\$74,567.60

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 44 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

57216

TOTAL DUE THIS BILL:

\$74,567.60

BALANCE PRIOR STATEMENTS

57055 12/14/2021 \$102,909.75

PRIOR BALANCE DUE \$102,909.75

TOTAL NOW DUE: \$177,477.35

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 56782 November 8, 2021 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$123,110.00

CURRENT DISBURSEMENTS: \$0.30

TOTAL DUE THIS BILL: \$123,110.30

PRIOR BALANCE DUE: \$136,510.00

TOTAL NOW DUE: \$259,620.30

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 56782 November 8, 2021 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH October 31, 2021

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u> 10/01/2021	<u>Atty</u> JTG	<u>Description</u> ATTENTION TO <u>DISCOVERY RESPONS</u> ES	<u>Time</u> 4.30 Hrs	<u>Rate</u> 650.00 /hr
10, 01, 2021	jio	AND DOCS RE:		000.00 / 111
		REVIEW EXHIBITS		
10/04/2021	JTG	EMAILS FROM AND TO OPPOSING COUNSEL AND WITH CLIENT;	6.10 Hrs	650.00 /hr
		INVESTIGATE ;		
10/05/2021	JTG	OPTIONS. ATTENTION TO	7.60 Hrs	650.00 /hr
		INITIAL DISCLOSURES; FOLLOW UP ON P. ZACHARAKIS'S		
		REVIEW; DIG INTO		
		; ATTENTION TO DEMAND LETTER FOR DEFENDANTS RE:		
		ORDER FROM COURT DENYING MOTION		
		FOR CLARIFICATION; RELATED TEAM AND CLIENT EMAILS; FOLLOW UP EMAIL		
		FROM DEF. COUNSEL.		
10/06/2021	JTG	EMAIL TO OPPOSING COUNSEL DEMANDING MEET AND CONFER:	4.60 Hrs	650.00 /hr
		RESPONSES; INVESTIGATE		
		INVESTIGATE		
10/07/2021	JTG	PREPARE FOR AND CONDUCT MEET AND	7.10 Hrs	650.00 /hr
		CONFER WITH OPPOSING COUNSEL; TEAM DISCUSSIONS AND EMAIL TO		

CESARI AND MCKENNA, LLP			BILL NUMBE	R 56782
		CLIENT; ATTENTION TO STRATEGIC CHOICES; INVESTIGATE JOINT RESPONSE TO NEW MOTION AND IN SUPPORT OF OUR OWN MOTION FOR CONTEMPT OR TO SHOW CAUSE; INVESTIGATE		
10/08/2021	JTG	PREPARE FOR AND CONDUCT CALL WITH CLIENT; BEGIN OUTLINING MOTION FOR CONTEMPT; CONSULT PROCEDURE TREATISE AND AUTHORITIES.	4.80 Hrs	650.00 /hr
10/11/2021	JTG	REVIEW ADMISSIONS; RECEIVE,	6.90 Hrs	650.00 /hr
		REVIEW AND DISTRIBUTE MOTION FOR SECOND CLARIFICATION; REVIEW EXHIBITS AND DECLARATIONS IN SUPPORT THEREOF.		
10/12/2021	JTG	IDENTIFY RESEARCH NEEDS FOR MOTION/OPPOSITION; TEAM EMAILS ON DEF'S MOTION AND STRATEGIES FOR RESPONSE; TURN BACK TO OPTIONS ON NEXT DISCOVERY STEPS AND PURSUING REVIEW LUCAS TRANSCRIPT AND	10.20 Hrs	650.00 /hr
10/13/2021	JTG	RELATED EMAILS. GO THROUGH GAJEWSKI AND BLUE SUN DEPO TRANSCRIPT AND EXHIBITS;	8.40 Hrs	650.00 /hr
10/14/2021	JТG	INPUT FROM TEAM RE: RESEARCH FOR MOTION/OPPOSITION; REVIEW CASES ; CONTINUE	8.80 Hrs	650.00 /hr
		REVIEW FOR OUTSTANDING/UNANSWERED ISSUES AND DISCOVERY FOLLOWUP: ATTENTION TO UNANSWERED DISCOVERY.		
10/15/2021	JТG	TEAM EMAILS RE: ATTENTION TO OPPOSITION STRATEGY; REVIEW	7.70 Hrs	650.00 /hr

CESARI AN	D MCK	ENNA, LLP	BILL NUMBE	R 56782
10/16/2021	JTG	DEVELOP OUTLINE FOR BRIEF IN OPPOSITION AND IN SUPPORT FOR CONTEMPT MOTION; IDENTIFY REVIEW	5.70 Hrs	650.00 /hr
10/18/2021	JTG	CORR. RE: ATTENTION TO CASE LAW FOR OUR BRIEF; WORK ON LEGAL ARGUMENTS FOR OUR BRIEF; EMAILS WITH CLIENT AND FOLLOWUP ON REVIEW EMAIL RECORD	8.50 Hrs	650.00 /hr
10/19/2021	JTG	CORR. FROM DEFENDANTS RE: DISCOVERY PRODUCTION CHALLENGEE; REVIEW RESEARCH FROM P. ZACHARAKIS ON AND RELATED QUESTIONS; INCORPORATE INTO OUTLINE; BEGIN DRAFTING BRIEF.	10.20 Hrs	650.00 /hr
10/20/2021	JTG	CORR. W/ AND OTHERS RE: DOCUMENTATION OF WORK ON BRIEF.	11.60 Hrs	650.00 /hr
10/21/2021	JTG	CONTINUE TO DEVELOP DRAFT BRIEF; FOLLOW UP FROM TEAM ON WITH DEFENDANTS.	12.20 Hrs	650.00 /hr
10/22/2021	JТG	COMPLETE AND REVISE DRAFT BRIEF/OPPOSITION; TEAM EMAILS; REVIEW DRAFT OLSON DECLARATION AND LOOK AT POTENTIAL EXHIBITS TO USE; CORR. WITH COURT CLERK; REVIEW SCHEDULING ORDER ISSUED BY COURT AND ASSIGNMENT TO MAGISTRATE JUDGE.	14.90 Hrs	650.00 /hr
10/23/2021	JTG	REVISE BRIEF; ATTENTION TO FORM OF RELIEF SOUGHT, PROPOSED FORM OF ORDER AND COVER MOTION.	9.60 Hrs	650.00 /hr
10/24/2021	JТG	FINALIZE BRIEF REVISE DECLARATION.	6.70 Hrs	650.00 /hr
10/25/2021	JTG	INCORPORATE COMMENTS AND	10.60 Hrs	650.00 /hr

		2 0	101111211012		o rago lo o	. 120
CESARI ANI	D MCK	ENNA, LLP			BILL NUM	BER 56782
		COMPLETE BRIEF; FINA PROPOSED ORDER ANI RELIEF; ADDRESS ISSUI ; FINALI MOTION; MULTIPLE TE CONFIRM FILING OF A	D FORM OF ES ZE COVER EAM EMAIL	S;		
10/26/2021	JТG	ATTENTION TO SELECT DAMAGES EXPERT AND FOLLOW UP WITH INVESTIGATION; TEAM EMAIL ROPTIONS; ATTENTION EILERT AND GLENISTE	D OPTIONS RE: DISCOVI TO DEPOSI	ERY	6.40 Hrs	650.00 /hr
10/27/2021	JTG	FEEDBACK ON CONTE FINALIZE DEPO NOTIC AND GLENISTER; ATTE WAVE OF DISCOVERY.	CES FOR EII	ERT	5.20 Hrs	650.00 /hr
10/28/2021	JTG	ATTENTION TO POTEN AND NEXT WAVE OF D REQUESTS; QUESTIONS DISK DRIVE MATERIAL	OISCOVERY S OF GAJEW		5.50 Hrs	650.00 /hr
10/29/2021	JTG	CONVERSATIONS WITH EXPERTS; W DISCOVERY AND DOC. DEFENDANTS; ATTENT WHEN ADDITIONAL EV AVAILABLE.	ORK ON NI REQUESTS I'ION TO	FOR //ILL BE	5.80 Hrs	650.00 /hr
				TOTAL SER	VICES:	\$123,110.00
SERVICES S	UMMA	RY				
Gutkoski, Joh	ın T.	189.40	650.00	\$123,110.00		

DISBURSEMENTS:

U.S. Courts: PACER; SEARCH FEE \$0.30 08/17/21

> TOTAL DISBURSEMENTS: \$0.30

> > \$123,110.30 **MATTER TOTAL:**

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 50 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

56782

TOTAL DUE THIS BILL: \$123,110.30

BALANCE PRIOR STATEMENTS

 56444
 09/24/2021
 \$75,410.00

 56570
 10/08/2021
 \$61,100.00

PRIOR BALANCE DUE \$136,510.00

TOTAL NOW DUE: \$259,620.30

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 58332 June 10, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$117,652.50

CURRENT DISBURSEMENTS: \$10,965.60

TOTAL DUE THIS BILL: \$128,618.10

PRIOR BALANCE DUE: \$345,972.98

TOTAL NOW DUE: \$474,591.08

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:

ABA/Routing Number: Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number: 58332

June 10, 2022

File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH May 31, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	Description	<u>Time</u>	<u>Rate</u>
05/01/2022	JTG	DEPOSITION PREPARATION,	5.00 Hrs	675.00 /hr
05/02/2022	JTG	ITG DEPOSITION PREP AND WORK ON EXPERT MATERIALS.	12.60 Hrs	675.00 /hr
05/03/2022	JTG	FINAL PREP FOR AND DEPOSE ITG/WILT; ATTENTION TO DISCOVERY MATTERS.	10.80 Hrs	675.00 /hr
05/04/2022	JTG	PREPARE WITH RON GEIS; PREPARE FOR DEPOSITION OF DOUG EVANS; RELATED DISCOVERY COMPLETION ISSUES.	11.20 Hrs	675.00 /hr
05/05/2022	JTG	FINAL PREP FOR AND DEPOSE DOUGLAS EVANS; ATTENTION TO EXPERT REPORT MATTERS; REMAINING DISCOVERY ISSUES.	9.20 Hrs	675.00 /hr
05/06/2022	JTG	PREPARE FOR AND DEFEND RON GEIS DEPOSITION; EXCHANGES WITH OPPOSING SIDE; ATTENTION TO EXPERT REPORT PREP.	7.60 Hrs	675.00 /hr
05/08/2022	JTG	ATTENTION TO EXPERT REPORT AND .	4.40 Hrs	675.00 /hr
05/09/2022	JTG	TEAM CONFERENCE CALL; DAMAGES WORK; PREPARE FOR AND CONDUCT STATUS CONF.; CLIENT EMAILS.	6.30 Hrs	675.00 /hr
05/10/2022	JTG	EXPERT AND DAMAGES ISSUES; TEAM EMAILS.	3.70 Hrs	675.00 /hr
05/11/2022	JTG	EDITS TO SUPPL. INTERROGATORY RESPONSES; ATTENTION TO ISSUES.	4.20 Hrs	675.00 /hr
05/13/2022	JTG	CONDUCT CALL WITH AND ATTENTION TO EXPERTS AND REPORT QUESTIONS AND NEEDED MATERIALS.	5.70 Hrs	675.00 /hr
05/14/2022	JTG	ATTENTION TO SUPPL.	2.90 Hrs	675.00 /hr

CESARI AN	D MCK	ENNA, LLP	BILL NUM	BER 58332
		INTERROGATORIES.		
05/16/2022	JTG	ATTENTION TO DEPOSITION ISSUES AND DAMAGES PROOF ISSUES.	3.30 Hrs	675.00 /hr
05/17/2022	JTG	REVIEW AND COMMENTS ON DRAFT EXPERT REPORT; ATTENTION TO FURTHER EVIDENCE NEEDED; ATTENTION TO SUPPL. INTERR. INFORMATION	8.30 Hrs	675.00 /hr
05/18/2022	JTG	WORK ON EXPERT REPORT; TEAM FEEDBACK; CORR. WITH EXPERTS; ATTENTION TO DEPO EVIDENCE; ATTENTION TO SUPPL. INT. ANSWERS; ATTENTION TO LETTER RESPONSE.	11.80 Hrs	675.00 /hr
05/19/2022	JTG	EXPERT REPORT AND DAMAGES ISSUES.	7.60 Hrs	675.00 /hr
05/20/2022	JTG	REVIEW AND COMMENTS ON EXPERT REPORT ISSUES.	7.80 Hrs	675.00 /hr
05/21/2022	JTG	REVIEW AND REVISE LATEST DRAFT REPORT; DETAILED CALL WITH EXPERT; REVIEW CITED EVIDENCE.	11.60 Hrs	675.00 /hr
05/22/2022	JTG	WORK ON EXPERT REPORT; VARIOUS TEAM EMAILS AND CORR. WITH EXPERT TEAM AND CLIENT.	10.60 Hrs	675.00 /hr
05/23/2022	JTG	COMMENTS ON REPORT REVISIONS; CALLS WITH EXPERT; FINAL REVIEW; FOLLOW UP WITH TEAM AFTER CLIENT CALL; ATTENTION TO EXHIBITS; FINAL REVIEW AND SIGNOFF.	13.20 Hrs	675.00 /hr
05/24/2022	JTG	DRAFT, REVISE AND FINALIZE RESPONSE LETTER; ATTENTION TO FOR CLIENT.	2.20 Hrs	675.00 /hr
05/25/2022	JTG	ATTENTION TO REPORT RELATED ISSUES AND QUESTIONS; WORK ON SUPPL.NT. RESPONSES.	2.70 Hrs	675.00 /hr
05/27/2022	JTG	REVIEW FOR SUPPL INTERR. RESPONSES.	5.30 Hrs	675.00 /hr
05/31/2022	JTG	CONTINUE REVIEW SUPPLEMENTING INTERROGATORIES; ATTENTION TO APPLICATION NOTES PRODUCTION ISSUES.	6.30 Hrs	675.00 /hr
		TOTALSI	ERVICES:	\$117,652.50

SERVICES SUMMARY

Gutkoski, John T. 174.30 675.00 \$117,652.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 54 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER 58332

DISBURSEMENTS:

StoneTurn Group, LLP; EXPERT FEE Invoice 13929 \$8,173.50

05/27/2022

Target Litigation Consulting, Inc.; CONSULTING FEES \$2,792.10

Invoice 23182 Services through 05/31/2022

TOTAL DISBURSEMENTS: \$10,965.60

MATTER TOTAL: \$128,618.10

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 55 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

58332

TOTAL DUE THIS BILL:

\$128,618.10

BALANCE PRIOR STATEMENTS

 57845
 04/06/2022
 \$146,050.00

 58101
 05/05/2022
 \$199,922.98

PRIOR BALANCE DUE \$345,972.98

TOTAL NOW DUE: \$474,591.08

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 58966 September 9, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$85,387.50

TOTAL DUE THIS BILL: \$85,387.50

PRIOR BALANCE DUE: \$181,775.60

TOTAL NOW DUE: \$267,163.10

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 58966 September 9, 2022 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH August 31, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	<u>Description</u>	<u>Time</u>	Rate
08/01/2022	JTG	ATTENTION TO	6.10 Hrs	675.00 /hr
		DAMAGES ISSUES AND DEPOSITION PREP.		
08/02/2022	JTG	REVIEW OF EXPERT REPORT	8.40 Hrs	675.00 /hr
		AND SUPPORTING MATERIALS.		
08/03/2022	JTG	EXPERT DEPOSITION PREPARATION	5.90 Hrs	675.00 /hr
08/04/2022	JTG	PREPARE FOR DEFENDING EXPERT	9.60 Hrs	675.00 /hr
		DEPOSITION; TEAM CALL WITH		
		ZOLTOWSKI AND STONETURN TEAM;		
08/05/2022	JTG	FINAL PREPARATION FOR AND DEFEND	7.20 Hrs	675.00 /hr
		ZOLTOWSKI DEPOSITION; FOLLOW UP		
		DISCUSSIONS.		
08/09/2022	JTG	CALL WITH E. OLSON.	1.10 Hrs	675.00 /hr
08/11/2022	JTG	ATTENTION TO	5.30 Hrs	675.00 /hr
		STRATEGIC OPTIONS.		
08/18/2022	JTG	CALL WITH OPPOSING COUNSEL; TEAM	5.60 Hrs	675.00 /hr
		AND CLIENT EMAILS; ATTENTION TO		
		LEGAL AUTHORITIES REGARDING		
		THEORIES AND DEFENDANTS' POSITIONS.		
08/19/2022	JTG	READ AND REVIEW ITG MOTION AND	6.60 Hrs	675.00 /hr
00/17/2022	<i>j</i> 10	SUPPORTING MATERIALS.	0.00 1113	075.00 7111
08/20/2022	JTG	WORK ON PLANNING OPPOSITION TO SJ	3.40 Hrs	675.00 /hr
		MOTION FROM ITG.		-
08/21/2022	JTG	REVIEW TRANSCRIPTS CITED BY ITG'S	3.60 Hrs	675.00 /hr
		MOTION PAPERS.		

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 58 of 418

CESARI ANI	D MCKI	BILL NUMB	ER 58966	
08/22/2022	JTG	ATTENTION TO SJ MOTION AND OPPOSITION; EMAILS WITH TEAM AND CLIENT; EMAILS WITH OPPOSING COUNSEL REGARDING NEW MOTION ON INJUNCTION.	8.10 Hrs	675.00 /hr
08/23/2022	JTG	TEAM CALL RE; SJ OPPOSITION; REVIEW OF LAW; REVIEW OF RECORD MATERIALS; EMAILS WITH OPPOSING COUNSEL REGARDING INJUNCTION MOTION.	8.30 Hrs	675.00 /hr
08/24/2022	JTG	ATTENTION TO NEW INJUNCTION MOTION; TEAM EMAILS RE: SAME.	7.30 Hrs	675.00 /hr
08/25/2022	JTG	ATTENTION TO EVIDENCE TO COUNTER AND OPPOSE BOTH MOTIONS BY DEFENDANTS; CALL WITH B. MITCHELL; ATTENTION TO BUDGET AND STRATEGIC OPTIONS.	8.50 Hrs	675.00 /hr
08/26/2022	JTG	ATTENTION TO SJ AND INJUNCTION MOTION OPPOSITIONS.	7.10 Hrs	675.00 /hr
08/28/2022	JTG	WORK ON SJ MOTION AND REVIEW OF RECORD EVIDENCE.	4.40 Hrs	675.00 /hr
08/29/2022	JTG	CALL WITH TEAM AND ATTENTION TO INJUNCTION MOTION.	6.70 Hrs	675.00 /hr
08/30/2022	JTG	ATTENTION TO SJ AND INJUNCTION OPPOSITIONS.	6.10 Hrs	675.00 /hr
08/31/2022	JTG	ATTENTION TO OPPOSITIONS. TOTAL SER	7.20 Hrs	675.00 /hr \$85,387.50

SERVICES SUMMARY

Gutkoski, John T. 126.50 675.00 \$85,387.50

MATTER TOTAL: \$85,387.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 59 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

58966

TOTAL DUE THIS BILL: \$85,387.50

BALANCE PRIOR STATEMENTS

 58332
 06/10/2022
 \$28,618.10

 58601
 07/18/2022
 \$83,902.50

 58733
 08/11/2022
 \$69,255.00

PRIOR BALANCE DUE \$181,775.60

TOTAL NOW DUE: \$267,163.10



Green Legal Technology, Inc. 267-800-4410 746 Thoreau Drive Ambler, PA 19002

APPROVED

By Kevin Mosier at 11:57 am, Jun 08, 2023

Billed To

Accounts Payable KPM Analytics North America 8 Technology Drive Westborough, MA 01581 Date of Issue 06/06/2023

Due Date 07/06/2023

Invoice Number

\$36,683.35

Description	Rate	Qty	Line Total
Presentation Consulting (KPM v Blue Sun) Dylan Green – Apr 19, 2023 Initial labeling and branding of exhibits.	\$300.00	2	\$600.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – Apr 24, 2023 Additional exhibit branding.	\$300.00	0.25	\$75.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – Apr 26, 2023 Additional exhibit branding.	\$300.00	0.25	\$75.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – Apr 27, 2023 Additional exhibit branding. Initial database setup with plaintiff and defense exhibits.	\$300.00	1.5	\$450.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – Apr 30, 2023 Travel to Worcester, MA. Billed as half day on site.	\$300.00	4	\$1,200.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 1, 2023 Setup on site, courtroom test, war room support.	\$300.00	8	\$2,400.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 2, 2023 Prep for trial.	\$300.00	9.5	\$2,850.00
Presentation Consulting	\$300.00	10	\$3,000.00

(KPM v Blue Stan PD ylian 1 GFeen 1 0 May 23, 14 or 26	Document 275-1	Filed 07/26/23	Page 61 of 418
Day 1 of trial and prep			

, ,			
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 4, 2023 Day 2 of trial.	\$300.00	8	\$2,400.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 5, 2023 Day 3 of trial.	\$300.00	8	\$2,400.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 7, 2023 Prep for trial / on site minimum.	\$300.00	4	\$1,200.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 8, 2023 Day 4 of trial.	\$300.00	8	\$2,400.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 9, 2023 Day 5 of trial.	\$300.00	8	\$2,400.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 10, 2023 Day 6 of trial and prep.	\$300.00	8.5	\$2,550.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 11, 2023 Day 7 of trial and prep.	\$300.00	9	\$2,700.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 12, 2023 Day 8 of trial.	\$300.00	8	\$2,400.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 14, 2023 Closing prep.	\$300.00	6	\$1,800.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 15, 2023 Day 9 of trial and closing prep.	\$300.00	10	\$3,000.00
Presentation Consulting (KPM v Blue Sun) Dylan Green – May 16, 2023 Closing arguments, break down of court/war room, return travel.	\$300.00	8	\$2,400.00
Hilton Garden Inn (KPM v Blue Sun) May 2, 2023 - First two hotel nights due to check in error.	\$383.35	1	\$383.35

Subtotal	36,683.35
Tax	0.00
Total Amount Paid	36,683.35 0.00

Amount Due (USD)

\$36,683.35

Terms

Thank you for your business. Please remit payment within 30 days unless otherwise specified.

Invoice #: 245391 June 7, 2021

Client-Matter: 10255-36384

RE: NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
5/10/21	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding expedited discovery requests and strategy; prepare for same.	.50
5/10/21	PKZ	Draft 30(b)(6) Deposition Notice to The Innovative Technologies Group & Co., Ltd. Call with J. Gutkoski and S. Magee regarding Request for Production of Documents and 30(b)(6) deposition notice drafts to defendants; Review and edit Request for Production of Documents to Defendants; Draft 30(b)(6) Deposition Notice and Schedule A for Blue Sun Scientific	2.50
5/11/21	SRM	Emails regarding meet and confer on motion to dismiss.	.20
5/12/21	SRM	Telephone conference with opposing counsel regarding meet and confer on motions to dismiss; research regarding	.60
5/13/21	PKZ	Legal research in preparation for Opposition to Motion to Dismiss; Meet and confer with defense counsel and J. Gutkoski and S. Magee; Legal research into personal jurisdiction in preparation for Opposition to Motion to Dismiss	.85
5/14/21	SRM	Telephone conference with clients regarding ; review filings regarding discovery and motions to dismiss.	3.20
5/14/21	PKZ	Summarize research findings and email to S. Magee and J. Gutkoski; Review Motions to Dismiss and Opposition to Emergency Motion for Expedited Discovery; Call with S. Magee and J. Gutkoski regarding Motions to Dismiss and Opposition to Cross Motion to Stay Discovery; Legal research - Client call with J. Gutkoski and S. Magee regarding Motions to Dismiss and Opposition to Cross Motion to Stay Discovery; Legal research - expedited discovery Legal research - discovery	7.85
5/15/21	SRM	Work on opposition to motion to stay discovery.	2.60
5/15/21	PKZ	Review and edit Opposition to Motion to Stay Discovery; Research cases cited by defendants in Opposition to Emergency Motion for Expedited Discovery and email summary/notes to S. Magee and J. Gutkoski	2.40
5/16/21	SRM	Review P. Zacharakis edits to opposition to motion to stay discovery; emails regarding same.	.60
5/17/21	SRM	Review and comment on opposition to motion to stay; finalize and file with court opposition; prepare for motion hearing; emails with P. Zacharakis and J. Gutkoski regarding same.	2.20

Invoice #: 245391 June 7, 2021

Date	Atty	Description	Hours
5/17/21	PKZ	Review final Opposition to Motion to Stay Discovery; Legal research into trade secrets. Email to M. Mitchell regarding letter Legal research into filing a preliminary injunction motion	1.80
5/18/21	SRM	Prepare for and attend motion hearing regarding expedited discovery; research regarding same; telephone conferences with J. Gutkoski and P. Zacharakis regarding same.	3.50
5/18/21	PKZ	Meeting with J. Gutkoski and S. Magee regarding Hearing on Motion for Expedited Discovery; Prepare for call with S. Magee and J. Gutkoski regarding Hearing on Emergency Motion for Expedited Discovery; Call with J. Gutkoski and S. Magee in preparation for Hearing on Emergency Motion for Expedited Discovery; Review R. Glenister Motion to Dismiss; Attend Hearing on Motion for Expedited Discovery	1.70
5/19/21	SRM	Review letter to Judge Hillman and supporting emails; emails with J. Gutkoski, P. Zacharakis and client regarding review order from Judge Hillman regarding expedited discovery and preliminary injunction motion; emails regarding same and consideration of impact on scope of discovery.	2.10
5/19/21	PKZ	Redact email chain and email to J. Gutkoski to submit to the court; Review email chain relating to account and email to J. Gutkoski	.70
5/20/21	SRM	Review deposition notice and draft documents requests; edit and comment on same.	.90
5/20/21	PKZ	Edit Request for Production of Documents to individual defendants; Draft Request for Production of Documents to Blue Sun; Draft Request for production of documents to R. Gajewski; Draft Request for Production of Documents to M. Gajewski; Draft Request for Production of Documents to R. Glenister; Edit Request for Production of Documents to Blue Sun; Edit Request for Production of Documents to A. Eilert; Edit Request for Production of Documents to M. Gajewski; Email to J. Gutkoski and S. Magee regarding Requests for Production of Documents; Draft Request for Production of Documents to A. Eilert; Draft Deposition Notice R. Gajewski Attend client meeting regarding Court Order on Motion for Expedited Discovery; Call with J. Gutkoski regarding individual defendant request for production of documents; Edit notes from client meeting and email to S. Magee; Email to J. Gutkoski and S. Magee regarding edits to Request for Production of Documents to individual defendants; Edit individual defendants Request for Production of Documents, research Federal Rules and Local Rules and email to S. Magee and J. Gutkoski	4.85
5/21/21	SRM	Review, edit and comment on document requests to defendants; review document requests from corporate defendants; emails with clients and J. Gutkoski and P. Zacharakis regarding same; emails with defendants' counsel regarding motions to dismiss briefing.	1.60

Invoice #: 245391 June 7, 2021

Date	Atty	Description	Hours
5/21/21	PKZ	Finalize all requests for production of documents and letters to counsel and dispatch requests to all counsel; Emails from/to J. Gutkoski regarding definitions on individual defendants' request for production of documents; Draft request for production of documents G. Israelson; Edit all individual defendants' request for production of documents; Edit request for production of documents to Blue Sun; Email to J. Gutkoski and S. Magee regarding updated request for production of documents to defendants; Draft and edit letter to corporate defense counsel with request for production of documents; Draft and edit cover letter to individual defendants' counsel enclosing request for production of documents	2.85
5/24/21	SRM	Emails regarding motion to dismiss briefing and extension motions.	.40
5/24/21	PKZ	Emails from/to J. Gutkoski regarding Verified Complaint with Exhibits; Review Request for Production of Documents to KPM from Defendants; Email from/to J. Gutkoski regarding two-tier protective order; Client meeting regarding collecting documents to respond to request for production of documents; Email clients rule regarding definition of "document"	1.45
5/25/21	SRM	Draft and file with court motion to extend time to file oppositions to motions to dismiss; draft and file with court motion for leave to file oversized brief.	2.10
5/26/21	SRM	Attention to document production issues; analysis of document requests from entity defendants; emails with regarding e-discovery.	.90
5/27/21	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding discovery planning and oppositions to motions to dismiss; conference call with clients regarding same; contact regarding background of litigation for ediscovery planning.	2.90
5/27/21	PKZ	Client meeting regarding document collection; Call with S. Magee and J. Gutkoski regarding client document collection; Research protective order and email to J. Gutkoski and S. Magee	1.50
5/28/21	SRM	Review and analyze outlines for oppositions to motions to dismiss; emails with J. Gutkoski and P. Zacharakis regarding same; review case law regarding same; attention to document collection issues.	2.80
5/29/21	PKZ	Review R. Glenister's Motion to Dismiss; Review outline of opposition to motions to dismiss and email to J. Gutkoski and S. Magee; Legal research for Oppositions to Motions to Dismiss and email to S. Magee; Legal research for opposition to Motions to Dismiss	4.75
5/31/21	PKZ	Legal research for oppositions to Motions to Dismiss; Review Opposition to Individual Defendant's Motions to Dismiss Outline; Review and annotate M. Gajewski Motion to Dismiss	3.75

TOTAL PROFESSIONAL SERVICES

\$ 25,608.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 66 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 245391 June 7, 2021

EXPENSES

Date	Description	Amount
4/30/21	SRM Complaint Filing Fees	402.00
4/30/21	SRM Service of Complaint, Summons, etc, (KPM/NIR)	591.60
	TOTAL EXPENSES	\$ 993.60
	MATTER TOTAL	\$ 26,601.60
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	TOTAL THIS INVOICE	\$ 29,108.60

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 67 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 245391 June 7, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
244587	5/11/21	65,542.12	.00	65,542.12

Previous Balance \$ 65,542.12

Total Due This Invoice \$29,108.60

TOTAL BALANCE DUE \$94,650.72



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

April 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through March 31, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 69 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

April 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 242803 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through March 31, 2021:

Matter #	Description	Services	Expenses	Total
36384	NIR Senry	65,354.00	.00	65,354.00
Total		73,021.50	.00	73,021.50

TOTAL THIS INVOICE \$ 73,021.50

Previous Balance \$ 5,812.69

TOTAL BALANCE DUE <u>\$ 78,834.19</u>

100% charged to Integration Expense - Blue Sun Litigation - Invoice detail on file with CFO

Invoice #: 242803 April 9, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
229626	7/21/20	1,297.00	.00	1,297.00
240460	2/08/21	2,771.24	.00	2,771.24
241827	3/08/21	2,428.45	684.00	1,744.45

Previous Balance \$ 5,812.69

Total Due This Invoice \$ 73,021.50

TOTAL BALANCE DUE <u>\$78,834.19</u>

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 71 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

April 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 242803 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 73,021.50

Previous Balance \$5,812.69

TOTAL BALANCE DUE \$78,834.19

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

May 11, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through April 30, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 73 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

May 11, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 244587 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through April 30, 2021:

Matter #	Description	Services	Expenses	Total
36384	NIR Senry	63,989.50	517.12	64,506.62
Total		65,025.00	517.12	65,542.12

TOTAL THIS INVOICE \$ 65,542.12

Previous Balance \$73,021.50

TOTAL BALANCE DUE \$138,563.62

Invoice approved for payment. 100% Integration expense related to Blue Sun legal matter. Invoice details with CFO

Invoice #: 244587 May 11, 2021

TOTAL THIS INVOICE

\$ 65,542.12

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 75 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 244587 May 11, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
242803	4/09/21	73,021.50	.00.	73,021.50

Previous Balance \$73,021.50

Total Due This Invoice \$65,542.12

TOTAL BALANCE DUE \$ 138,563.62



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

May 11, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 244587 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 65,542.12

Previous Balance \$73,021.50

TOTAL BALANCE DUE \$ 138,563.62

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

June 7, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through May 31, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 78 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

June 7, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 245391 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through May 31, 2021:

Matter #	Description	Services	Expenses	Total
36384	NIR Senry	25,608.00	993.60	26,601.60
Total		28,115.00	993.60	29,108.60

TOTAL THIS INVOICE \$29,108.60

Previous Balance \$65,542.12

TOTAL BALANCE DUE \$94,650.72

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 79 of 418

Invoice #:	June 7, 2021
Client-Matter:	
RE:	
PROFESSIONAL SERVICES	

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 80 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: June 7, 2021

Client-Matter:

RE:

PROFESSIONAL SERVICES

Invoice #: 245391 June 7, 2021

Client-Matter: 10255-36384

RE: NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
5/10/21	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding expedited discovery requests and strategy; prepare for same.	.50
5/10/21	PKZ	Draft 30(b)(6) Deposition Notice to The Innovative Technologies Group & Co., Ltd. Call with J. Gutkoski and S. Magee regarding Request for Production of Documents and 30(b)(6) deposition notice drafts to defendants; Review and edit Request for Production of Documents to Defendants; Draft 30(b)(6) Deposition Notice and Schedule A for Blue Sun Scientific	2.50
5/11/21	SRM	Emails regarding meet and confer on motion to dismiss.	.20
5/12/21	SRM	Telephone conference with opposing counsel regarding meet and confer on motions to dismiss; research regarding jurisdiction	.60
5/13/21	PKZ	Legal research in preparation for Opposition to Motion to Dismiss; Meet and confer with defense counsel and J. Gutkoski and S. Magee; Legal research in preparation for Opposition to Motion to Dismiss	.85
5/14/21	SRM	Telephone conference with clients regarding responses to motion to dismiss and motion to stay discovery; review filings regarding discovery and motions to dismiss.	3.20
5/14/21	PKZ	Summarize research findings and email to S. Magee and J. Gutkoski; Review Motions to Dismiss and Opposition to Emergency Motion for Expedited Discovery; Call with S. Magee and J. Gutkoski regarding Motions to Dismiss and Opposition to Cross Motion to Stay Discovery; Legal research personal jurisdiction; Client call with J. Gutkoski and S. Magee regarding Motions to Dismiss and Opposition to Cross Motion to Stay Discovery; Legal research - expedited discovery Legal research - discovery	7.85
5/15/21	SRM	Work on opposition to motion to stay discovery.	2.60
5/15/21	PKZ	Review and edit Opposition to Motion to Stay Discovery; Research cases cited by defendants in Opposition to Emergency Motion for Expedited Discovery and email summary/notes to S. Magee and J. Gutkoski	2.40
5/16/21	SRM	Review P. Zacharakis edits to opposition to motion to stay discovery; emails regarding same.	.60
5/17/21	SRM	Review and comment on opposition to motion to stay; finalize and file with court opposition; prepare for motion hearing; emails with P. Zacharakis and J. Gutkoski regarding same.	2.20

Invoice #: 245391 June 7, 2021

Date	Atty	Description	Hours
5/17/21	PKZ	Review final Opposition to Motion to Stay Discovery; Legal research into trade secrets. Email to M. Mitchell regarding letter s Legal research into filing a preliminary injunction motion	1.80
5/18/21	SRM	Prepare for and attend motion hearing regarding expedited discovery; research regarding same; telephone conferences with J. Gutkoski and P. Zacharakis regarding same.	3.50
5/18/21	PKZ	Meeting with J. Gutkoski and S. Magee regarding Hearing on Motion for Expedited Discovery; Prepare for call with S. Magee and J. Gutkoski regarding Hearing on Emergency Motion for Expedited Discovery; Call with J. Gutkoski and S. Magee in preparation for Hearing on Emergency Motion for Expedited Discovery; Review R. Glenister Motion to Dismiss; Attend Hearing on Motion for Expedited Discovery	1.70
5/19/21	SRM	Review letter to Judge Hillman and supporting emails; emails with J. Gutkoski, P. Zacharakis and client regarding same; review order from Judge Hillman regarding expedited discovery and preliminary injunction motion; emails regarding same and consideration of impact on scope of discovery.	2.10
5/19/21	PKZ	Redact email chain and email to J. Gutkoski to submit to the court; Review email chain relating to account and email to J. Gutkoski	.70
5/20/21	SRM	Review deposition notice and draft documents requests; edit and comment on same.	.90
5/20/21	PKZ	Edit Request for Production of Documents to individual defendants; Draft Request for Production of Documents to Blue Sun; Draft Request for Production of Documents to M. Gajewski; Draft Request for Production of Documents to M. Gajewski; Draft Request for Production of Documents to R. Glenister; Edit Request for Production of Documents to Blue Sun; Edit Request for Production of Documents to A. Eilert; Edit Request for Production of Documents to M. Gajewski; Email to J. Gutkoski and S. Magee regarding Requests for Production of Documents; Draft Request for Production of Documents to A. Eilert; Draft Deposition Notice R. Gajewski Attend client meeting regarding Court Order on Motion for Expedited Discovery; Call with J. Gutkoski regarding individual defendant request for production of documents; Edit notes from client meeting and email to S. Magee; Email to J. Gutkoski and S. Magee regarding edits to Request for Production of Documents to individual defendants; Edit individual defendants Request for Production of Documents, research Federal Rules and Local Rules and email to S. Magee and J. Gutkoski	4.85
5/21/21	SRM	Review, edit and comment on document requests to defendants; review document requests from corporate defendants; emails with clients and J. Gutkoski and P. Zacharakis regarding same; emails with defendants' counsel regarding motions to dismiss briefing.	1.60

Invoice #: 245391 June 7, 2021

Date	Atty	Description	Hours
5/21/21	PKZ	Finalize all requests for production of documents and letters to counsel and dispatch requests to all counsel; Emails from/to J. Gutkoski regarding definitions on individual defendants' request for production of documents; Draft request for production of documents G. Israelson; Edit all individual defendants' request for production of documents; Edit request for production of documents to Blue Sun; Email to J. Gutkoski and S. Magee regarding updated request for production of documents to defendants; Draft and edit letter to corporate defense counsel with request for production of documents; Draft and edit cover letter to individual defendants' counsel enclosing request for production of documents	2.85
5/24/21	SRM	Emails regarding motion to dismiss briefing and extension motions.	.40
5/24/21	PKZ	Emails from/to J. Gutkoski regarding Verified Complaint with Exhibits; Review Request for Production of Documents to KPM from Defendants; Email from/to J. Gutkoski regarding two-tier protective order; Client meeting regarding collecting documents to respond to request for production of documents; Email clients	1.45
5/25/21	SRM	Draft and file with court motion to extend time to file oppositions to motions to dismiss; draft and file with court motion for leave to file oversized brief.	2.10
5/26/21	SRM	Attention to document production issues; analysis of document requests from entity defendants; emails with J. Rubel regarding e-discovery.	.90
5/27/21	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding discovery planning and oppositions to motions to dismiss; conference call with clients regarding document collection and discovery planning; emails regarding same; contact regarding background of litigation for ediscovery planning.	2.90
5/27/21	PKZ	Client meeting regarding document collection; Call with S. Magee and J. Gutkoski regarding client document collection; Research and email to J. Gutkoski and S. Magee	1.50
5/28/21	SRM	Review and analyze outlines for oppositions to motions to dismiss; emails with J. Gutkoski and P. Zacharakis regarding same; review case law regarding same; attention to document collection issues.	2.80
5/29/21	PKZ	Review and annotate R. Glenister's Motion to Dismiss; Review outline of opposition to motions to dismiss and email to J. Gutkoski and S. Magee; Legal research for Oppositions to Motions to Dismiss and email to S. Magee; Legal research for opposition to Motions to Dismiss	4.75
5/31/21	PKZ	Legal research for oppositions to Motions to Dismiss; Review and annotate Opposition to Individual Defendant's Motions to Dismiss Outline; Review and annotate M. Gajewski Motion to Dismiss	3.75

TOTAL PROFESSIONAL SERVICES

\$ 25,608.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 84 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 245391 June 7, 2021

EXPENSES

Date	Description	Amount
4/30/21	SRM Complaint Filing Fees	402.00
4/30/21	SRM Service of Complaint, Summons, etc, (KPM/NIR)	591.60
	TOTAL EXPENSES	\$ 993.60
	MATTER TOTAL	\$ 26,601.60
	TOTAL THIS INVOICE	\$ 29,108.60

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 85 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 245391 June 7, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
244587	5/11/21	65,542.12	.00	65,542.12

Previous Balance \$ 65,542.12

Total Due This Invoice \$29,108.60

TOTAL BALANCE DUE \$94,650.72

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 86 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

June 7, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 245391 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 29,108.60

Previous Balance \$65,542.12

TOTAL BALANCE DUE \$94,650.72

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Wire Instructions:

For domestic wire payments: Cambridge Trust

1336 Massachusetts Avenue, Cambridge MA 02138

ABA Routing # 011300595

Beneficiary Name: Morse, Barnes-Brown & Pendleton PC

Operating Acct # 0041001967

For international wire payments: Cambridge Trust

(USD denominated) SWIFT CODE CAUPUS31

ABA Routing # 011300595 Operating Acct # 0041001967

INVOICE IS PAYABLE UPON RECEIPT



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

July 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through June 30, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 88 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

July 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 247613 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through June 30, 2021:

Matter #	Description	Services	Expenses	Total
26204	MDM A 1 4' NID C	04 570 00	1.010.24	05.500.24
36384	KPM Analytics-NIR Senry	84,579.00	1,019.34	85,598.34
Total		99,489.00	1,157.34	100,646.34

TOTAL THIS INVOICE \$ 100,646.34

Previous Balance \$94,650.72

TOTAL BALANCE DUE \$195,297.06

	1101182, 21111, 22 2110 (11 01 12 12 12 12 13 1), 1 0
Invoice #:	July 9, 2021
RE:	
PROFESSIONAL SERVICES	
Date Atty Description	Hours

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 90 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

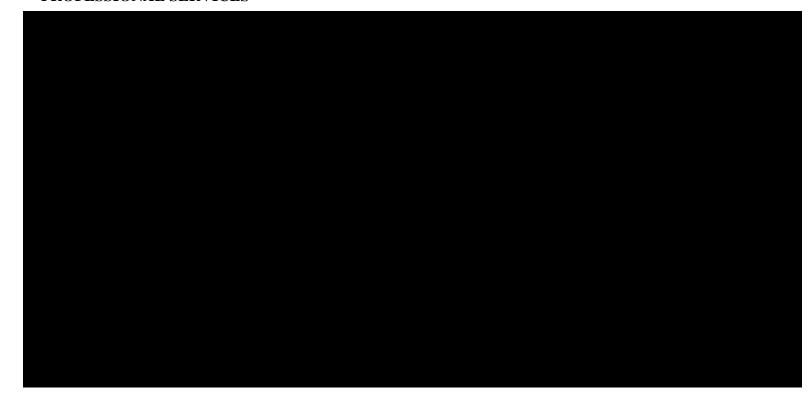
Invoice #: 247613 July 9, 2021

EXPENSES

Date Description Amount

Invoice #: ______ July 9, 2021

PROFESSIONAL SERVICES



Invoice #: 247613 July 9, 2021

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
6/01/21	SRM	Draft opposition to motion to dismiss by entity defendants; research regarding same.	9.50
6/01/21	PKZ	Legal research for oppositions to motions to dismiss; review Lucas motion to dismiss	7.95
6/02/21	SRM	Draft opposition to Blue Sun/ITG motion to dismiss.	9.10
6/02/21	PKZ	Legal research on Individual Defendants' Motion to Dismiss; review and to Opposition to Corporate Defendants' Motion to Dismiss; edit Opposition to Corporate Defendant's Motion to Dismiss and email to J. Gutkoski and S. Magee; legal research for Individual Defendants' Opposition to Motion to Dismiss	5.80
6/03/21	SRM	Edit, proofread, finalize and file with Court oppositions to motions to dismiss; emails with J. Gutkoski regarding same.	6.00
6/03/21	PKZ	Review and annotate motions to dismiss (individual defendants); emails from/to J. Gutkoski regarding ; email to J. Gutkoski, S. Magee, and K. Carey regarding research for Individual Defendants' opposition to motion to dismiss	.85
6/04/21	SRM	Attention to strategy for document production; emails regarding same.	1.50
6/07/21	SRM	Work on document production planning; emails with, J. Gutkoski and P. Zacharakis regarding same.	2.10
6/07/21	PKZ	Edit Responses to Request for Production of Documents; review proposed search terms and email to J. Gutkoski, S. Magee, and Target Litigation about document review; email from/to target litigation and J. Gutkoski regarding document production; call with target litigation ; draft Responses to Expedited Request for Production of Documents	2.60
6/08/21	SRM	Edit responses to document requests; analyze search term hit reports and prepare strategy for production in discovery; numerous emails regarding same.	2.20
6/08/21	PKZ	Email to target litigation and S. Magee regarding review S. Magee edits to Responses to Request for Production of documents and email to S. Magee and J. Gutkoski	.60

Invoice #: 247613 July 9, 2021

Date	Atty	Description	Hours
6/09/21	SRM	Telephone conference with P. Zacharakis regarding document review issues; begin work on review and analysis of documents for production; emails with J. Gutkoski regarding protective order; emails with regarding document production.	4.50
6/09/21	PKZ	Review protective order language and email to J. Gutkoski and S. Magee; call with S. Magee regarding initial document review; document review	4.20
6/10/21	SRM	Review and analyze documents for production; work with Target litigation regarding same; emails with J. Gutkoski and P. Zacharakis regarding same.	8.20
6/10/21	PKZ	Document review; email from/to S. Magee regarding redacting documents; email to target litigation regarding redacting documents	6.20
6/11/21	SRM	Review, comment on and analyze document responses; review defendants' document responses; work with vendor regarding document production; make document production.	4.20
6/11/21	PKZ	Review proposed response and email to S. Magee and J. Gutkoski; review final responses to expedited requests for documents and email to J. Gutkoski and S. Magee; draft letter to opposing counsel with responses to requests for documents Emails to/from J. Gutkoski and edits to letter to opposing counsel with responses to request for documents; emails from/to J. Gutkoski and S. Magee regarding designating documents attorney's eyes only; email to S. Magee regarding final responses to request for production of documents and cover letter	1.55
6/12/21	SRM	Download and initial analysis of entity defendants' document production; emails with J. Gutkoski regarding same.	1.20
6/14/21	SRM	Telephone conference with P. Zacharakis and J. Gutkoski regarding document review, production, potential motions to compel, and motion to dismiss hearing; review and analyze Blue Sun production; prepare	10.00
6/14/21	PKZ	Email from/to J. Gutkoski regarding protective order; call with J. Gutkoski and S. Magee regarding next steps for expedited discovery	.85
6/15/21	SRM	Review and analyze documents produced by Blue Sun; draft meet and confer demand to Blue Sun regarding document production; review motion for protective order; conference with P. Zacharakis regarding document review and key documents.	9.30

Invoice #: 247613 July 9, 2021

Date	Atty	Description	Hours
6/15/21	PKZ	Review S. Magee emails with Blue Sun Documents and email to S. Magee and J. Gutkoski; meeting with S. Magee regarding document review; review and finalize stipulated protective order; emails from/to S. Magee regarding moving for a protective order; review draft email to opposing counsel and email to J. Gutkoski and S. Magee; draft and edit Joint Motion for Protective Order; edit joint motion for protective order and dispatch to opposing counsel for approval; emails from/to S. Magee and J. Gutkoski regarding document review; finalize Joint Motion for Protective Order	2.10
6/16/21	SRM	Complete meet and confer demand to Blue Sun; emails with J. Gutkoski and P. Zacharakis regarding information learned from document review; review and analysis of additional documents for production.	3.90
6/16/21	PKZ	Document review; emails from/to J. Gutkoski and S. Magee regarding R. Gajewski document review	3.70
6/17/21	SRM	Conference with clients regarding , motions to dismiss, document production; continue review and analysis for documents for production in response to discovery requests; review and analyze reply briefs concerning motions to dismiss.	7.10
6/17/21	PKZ	Compile and email to J. Gutkoski and S. Magee regarding document review status; review each Individual Defendants' Motion to Dismiss and compose a list in preparation for hearing; email to K. Olson and S. Magee with additional cases to add to Motion to Dismiss hearing binder; email to S. Magee and J. Gutkoski regarding document review status; document review; emails from/to J. Gutkoski and S. Magee regarding Blue Sun document production; client meeting; review entity defendants' reply memo in support of motion to dismiss; email to S. Magee with document review update	4.70
6/18/21	SRM	Prepare for motion to dismiss hearing; work with and Target Litigation regarding supplemental document production; emails with team regarding same; review and analyze additional documents for production.	6.50
6/18/21	PKZ	Review individual defendants' reply memo in support of their motion to dismiss; document review; legal research and email to K. Olson ; draft meet and confer email to counsel for individual defendants; edit and dispatch email to individual defense counsel regarding meet and confer	3.60
6/20/21	SRM	Prepare for motion to dismiss hearing.	3.50
6/21/21	SRM	Meet and confer with Blue Sun's counsel regarding document request responses; continue preparing for motion to dismiss hearing; attend motion to dismiss hearing; telephone conference with J. Gutkoski, P. Zacharakis and E. Olson regarding	7.50

Invoice #: 247613 July 9, 2021

Date	Atty	Description	Hours
6/21/21	PKZ	Review documents relating to name change and email to J. Gutkoski and S. Magee; emails to/from defense counsel regarding meet and confer; prepare for meet and confer with entity defendants' counsel; meet and confer call with entity defense counsel; call with S. Magee and J. Gutkoski regarding next steps from meet and confer with entity defendants and motion to dismiss hearing; email to individual defendants' counsel regarding meet and confer; review notes from expedited discovery hearing and email to S. Magee and J. Gutkoski; email to S. Magee and J. Gutkoski regarding producing second round of documents to defendants; emails from/to S. Magee and J. Gutkoski regarding ; debrief call with S. Magee, J. Gutkoski ; attend motion to dismiss hearing Email to S. Magee and J. Gutkoski with draft deposition notices for Blue Sun, ITG, and R. Gajewski; document review	4.50
6/22/21	SRM	Meet and confer with counsel for individual defendants regarding discovery responses; telephone conference with P. Zacharakis and J. Gutkoski regarding document review and deposition preparation; edit Blue Sun deposition notice.	2.20
6/22/21	PKZ	Document review; review email from W. Prickett in response to meet and confer email; email to S. Magee and J. Gutkoski regarding preparation for meet and confer; meet and confer call with W. Prickett for individual defendants; call with J. Gutkoski and S. Magee regarding meet and confer with individual defendants	3.05
6/23/21	SRM	Attention to key Gajewski documents for depositions and hearing; emails with P. Zacharakis regarding same; attention to deposition notices and deposition outline issues.	3.50
6/23/21	PKZ	Document review; email from/to J. Gutkoski and S. Magee regarding Gajewski documents	3.20
6/24/21	SRM	Multiple rounds of edits on deposition notices; serve deposition notices; work on deposition planning confidential information and protective order; emails with P. Zacharakis regarding document review and deposition preparation.	3.90
6/24/21	PKZ	Call with S. Magee regarding next steps for KPM matter; review draft Blue Sun and ITGC 30(b)(6) deposition notice and add certificate of service to both; document review; add R. Gajewski document review notes to master document; review draft notices of deposition to Blue Sun and ITGS and email to S. Magee and J. Gutkoski; finalize R. Gajewski Deposition Notice; prepare	5.35

Invoice #: 247613 July 9, 2021

Date	Atty	Description	Hours
6/25/21	SRM	Call with B. Schumann, E. Olson, J. Gutkoski and P. Zacharakis regarding ; telephone conference with P. Zacharakis and J. Gutkoski regarding same; attention to key documents and deposition outlines for depositions.	2.90
6/25/21	PKZ	Emails from/to J. Gutkoski regarding Blue Sun invoices; review entity defendant meet and confer notes and email to J. Gutkoski regarding motion to compel; deposition exhibit preparation for R. Gajewski	2.70
6/28/21	SRM	Conference with B. Schumann and team regarding deposition preparation; telephone conference with P. Zacharakis and J. Gutkoski regarding same; work on document issues for deposition preparation; emails with Target litigation regarding same.	4.00
6/28/21	PKZ	Prepare deposition exhibits for R. Gajewski; call with S. Magee and J. Gutkoski regarding deposition plan; meeting with J. Gutkoski, S. Magee, E. Olson, and B. Schuman regarding B. Shuman deposition prep; schedule depositions ; review W. Prickett email regarding supplemental production of documents; upload exhibits to sharefile and email to J. Gutkoski and S. Magee	6.50
6/29/21	SRM	Work on deposition preparation and emails with J. Tumilty and P. Zacharakis regarding same.	2.10
6/29/21	PKZ	Deposition exhibit prep for R. Gajewski; emails regarding court reporter details for R. Gajewski deposition; upload documents for R. Gajewski deposition exhibits and emails to/from J. Gutkoski and S. Magee; organize and print Blue Sun deposition exhibits	7.15
6/30/21	SRM	Telephone conference regarding regarding status of litigation; telephone conference with J. Gutkoski regarding depositions; emails with J. Gutkoski regarding same; attention to deposition outline.	1.90
6/30/21	PKZ	Review Blue Sun documents from J. Gutkoski and email to J. Gutkoski with verification of their inclusion; Blue Sun deposition exhibit preparation; email to S. Magee and J. Gutkoski regarding deposition scheduling; organize and upload deposition exhibits to Exhibit Share; email from/to regarding deposition; emails from/to W. Prickett regarding R. Gajewski deposition	3.95

TOTAL PROFESSIONAL SERVICES

\$ 84,579.00

EXPENSES

Date	Description	Amount
5/01/21	Thomson Reuters - West, Online research, 5/1/2021, 844333949	294.74
5/01/21	Thomson Reuters - West, Online research, 5/1/2021, 844333949	77.81
6/01/21	Thomson Reuters - West, Online research, 6/1/2021, 844496455	646.79

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 97 of 418

Invoice #: 247613		July 9, 2021
	TOTAL EXPENSES	\$ 1,019.34
	MATTER TOTAL	\$ 85,598.34
	TOTAL THIS INVOICE	\$ 100.646.34

Invoice #: 247613 July 9, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
244587	5/11/21	65,542.12	.00	65,542.12
245391	6/07/21	29,108.60	.00	29,108.60

Previous Balance \$94,650.72

Total Due This Invoice \$100,646.34

TOTAL BALANCE DUE \$ 195,297.06

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 99 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

July 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 247613 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 100,646.34

Previous Balance \$94,650.72

TOTAL BALANCE DUE \$195,297.06

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 100 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

August 12, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through July 31, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 101 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

August 12, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 248432 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through July 31, 2021:

36384	KPM Analytics-NIR Senry	84,232.50	25,545.09	109,777.59
Total		102,341.00	25,705.88	128,046.88

TOTAL THIS INVOICE \$ 128,046.88

Previous Balance \$129,754.94

TOTAL BALANCE DUE \$257,801.82







Invoice #: 248432 August 12, 2021

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
7/01/21	SRM	Update outline; telephone conference with J. Gutkoski and P. Zacharakis regarding R. Gajewski deposition.	1.80
7/01/21	PKZ	Emails from/to regarding R. Gajewski deposition; Emails from/to W. Prickett regarding R. Gajewski deposition; Call with J. Gutkoski regarding deposition exhibits; Organize and upload final deposition exhibits for R. Gajewski; Emails from/to J. Gutkoski regarding final deposition exhibits for R. Gajewski; Review Post Deposition Proposed Exhibits for R. Gajewski Deposition; Attend R. Gajewski deposition; Call with S. Magee and J. Gutkoski regarding R. Gajewski deposition and exhibits; Deposition exhibit review in preparation for R. Gajewski deposition; Emails from/to J. Gutkoski and S. Magee regarding Blue Sun deposition exhibits.	9.95
7/02/21	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding deposition and injunction hearing planning; email to B. Schumann	1.00
7/02/21	PKZ	Call with S. Magee and J. Gutkoski regarding preparation for Blue Sun deposition; Email to client regarding preparation for KPM deposition; Email to L. Lake ; Blue Sun deposition exhibit preparation.	6.75
7/05/21	SRM	Conference call for E. Olson ; work on ITGC deposition preparation.	4.80
7/05/21	PKZ	KPM 30(b)(6) client prep meeting; Document research in preparation for Blue Sun deposition.	2.95
7/06/21	SRM	Prepare for ITGC and KPM depositions.	8.00
7/06/21	PKZ	Final research in preparation for Blue Sun deposition; Upload Blue Sun Deposition Exhibits; Emails from/to regarding Blue Sun deposition; Emails from/to Gutkoski regarding Blue Sun deposition; Attend Blue Sun deposition; Emails from/to regarding final Blue Sun deposition details and set up; Client call Emails from/to J. Gutkoski regarding Blue Sun deposition exhibits; Emails from/to opposing counsel and Veritext regarding KPM deposition; Deposition Exhibit preparation for ITGC deposition; Client call and call with S. Magee and J. Gutkoski regarding preparation for ITGC deposition.	11.10

Invoice #: 248432 August 12, 2021

Date	Atty	Description	Hours
7/07/21	SRM	Defend KPM deposition; prepare for ITGC deposition; telephone conferences with J. Gutkoski regarding same.	11.90
7/07/21	PKZ	Deposition exhibit preparation for ITGC deposition; Email to and email from/to S. Magee regarding Rough transcript; Call with S. Magee, J. Gutkoski, and client regarding ; Document search for regarding details for ITGC deposition.	2.65
7/08/21	SRM	Take deposition of ITGC; final preparation regarding same; telephone conference with J. Gutkoski regarding same and preparation for Schumann deposition; emails regarding same.	8.50
7/08/21	PKZ	Attend portion of ITGC deposition; Document review and email to J. Gutkoski Deposition preparation with B. Schumann.	4.10
7/09/21	SRM	R. Schumann deposition.	6.80
7/12/21	SRM	Attention to strategy for approaching motion hearing, supplemental briefing, evidence to use for both, and deposition analysis.	3.50
7/12/21	PKZ	Email to J. Gutkoski regarding files; Review Eilert produced files and email to J. Gutkoski; Review Gajewski produced files and create summary.	.90
7/13/21	SRM	Analyze deposition transcripts, exhibits and additional documents for use in motion hearing and supplemental briefing.	7.50
7/13/21	PKZ	Edit word document with produced by R. Gajewski and emails from/to J. Gutkoski and email to E. Olson; Legal research - documents; Client meeting regarding Preliminary Injunction hearing and status of evidence.	4.15
7/14/21	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding preparation for hearing on preliminary injunction motion; prepare for same by identifying potential testimony and exhibits; legal research regarding same,	6.50
7/14/21	PKZ	Prepare research summary; Call with J. Gutkoski and S. Magee regarding preliminary injunction hearing preparation; Prepare R. Glenister story in preparation for preliminary injunction hearing; Emails from/to S. Magee regarding noncompete claim.	3.15
7/15/21	SRM	Prepare for injunction hearing; isolate key evidence ; review and analyze motion to dismiss order.	9.60

Invoice #: 248432 August 12, 2021

Date	Atty	Description	Hours
7/15/21	PKZ	Prepare for Preliminary Injunction hearing; Email to E. Olson ; Prepare in preparation for Preliminary Injunction hearing; Review documents produced by defendants relating to and email to E. Olson; Email to regarding preliminary injunction hearing; Review R. Schumann deposition transcript; Review A. Eilert documents ; Review and individual defendants diverting customers ; Review motion to dismiss decision.	8.45
7/16/21	SRM	Final preparation for and attend motion hearing concerning preliminary injunction; conference call with team after hearing; work on edits to final proposed order.	4.90
7/16/21	PKZ	Email from/to S. Magee regarding B. Davies affidavit; Review R. Schumann deposition transcript; Email to S. Magee and J. Gutkoski regarding summary of themes/points defendants may make in preliminary injunction hearing; Review and edit proposed order on motion for preliminary injunction and emails to/from S. Magee and J. Gutkoski; Attend preliminary injunction hearing; Call with J. Gutkoski, S. Magee, and clients	3.40
7/19/21	SRM	Attention to preliminary injunction hearing transcript for use in supplemental briefing	5.20
7/20/21	SRM	Research and drafting concerning section of supplemental briefing; identify evidence regarding same.	8.10
7/20/21	PKZ	Review supplemental preliminary injunction brief outline and email from/to J. Gutkoski and S. Magee	.15
7/21/21	SRM	Work on section of brief; edit section of brief; work on E. Olson affidavit in further support of motion for preliminary injunction.	8.50
7/21/21	PKZ	Review research and draft paragraphs for supplemental preliminary injunction brief; Legal research for supplemental brief to preliminary injunction; Email to S. Magee and J. Gutkoski regarding research status for supplementary preliminary injunction brief.	1.95
7/22/21	SRM	Work on B. Davies declaration in support of motion for preliminary injunction; work on E. Olson declaration in support of motion for preliminary injunction; attention to exhibits to be used for preliminary injunction supplemental briefing and Magee Declaration concerning same; emails with J. Gutkoski and P. Zacharakis regarding same; edit sections of brief; draft and file with Court motion to impound protected material.	7.50

Invoice #: 248432 August 12, 2021

Date	Atty	Description	Hours
7/22/21	PKZ	Research for supplemental preliminary injunction brief and draft sections of brief; Email to J. Gutkoski and S. Magee regarding remaining items to be completed for supplemental preliminary injunction brief; Review draft Assented to Motion to File under Seal (supplemental preliminary injunction brief) and email to S. Magee and J. Gutkoski with edits.	3.45
7/23/21	SRM	Finalize and file with Court supplemental briefing in support of motion for preliminary injunction; proofread and edit brief; edit and finalize Magee, Olson and Davies declarations; telephone conferences with P. Zacharakis regarding brief and exhibits; telephone conference with E. Olson	10.50
7/23/21	PKZ	Review I. Lucas Deposition Transcript ; Edit and add citations to the record (supplemental preliminary injunction brief); Client meeting regarding ; Call with S. Magee regarding exhibits for supplemental preliminary injunction brief Insert citations into brief and prepare all exhibits for filing.	8.45
7/26/21	SRM	Attention to Olson and Schumann deposition transcripts review transcripts for	2.60
7/28/21	SRM	Attention to deposition errata and transcripts regarding same; emails with J. Gutkoski and P. Zacharakis regarding strategy for answers and mediation.	2.10
7/29/21	SRM	Review motion for extension of time to file answer by entity defendants; emails with L. Lake review individual defendants' answer and counterclaim; review motion to impound filed by defendants.	1.50
7/29/21	PKZ	Emails from/to J. Gutkoski and S. Magee regarding extension for corporate defendants to answer complaint; Review letter from W. Prickett regarding the return of the hard drives; Email to J. Gutkoski and S. Magee regarding letter from W. Prickett; Emails from/to J. Gutkoski regarding Counterclaims.	.40
7/30/21	SRM	Attention to supplemental filings by defendants; emails with J Gutkoski and P. Zacharakis regarding same.	1.00
7/30/21	PKZ	Review and annotate Individual Defendants' Answer to Verified Complaint and Counterclaims	.60

TOTAL PROFESSIONAL SERVICES

\$ 84,232.50

EXPENSES

Date	Description	Amount
7/01/21	Thomson Reuters - West, Online research, 7/1/2021, 844663352	999.05
7/14/21	Veritext LLC, Deposition Transcripts, 7/14/2021, 5129144	3,824.35
7/14/21	Veritext LLC, Deposition Transcripts, 7/14/2021, 5132445	1,633.50
7/16/21	Veritext LLC, Deposition Transcripts, 7/16/2021, 5130209	2,930.73

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 109 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Date	Description	Amount
7/17/21	VERITEXT LLC, Deposition Transcripts, 5130735, 7/17/2021	3,592.60
7/17/21	Veritext LLC, Deposition Transcripts, 7/17/2021, 5136612	2,417.91
7/17/21	Veritext LLC, Deposition Transcripts, 7/17/2021, 5138594	2,895.00
7/17/21	Veritext LLC, Deposition Transcripts, 7/17/2021, 5142466	2,300.00
7/20/21	MARIANNE KUSA-RYLL, RDR, CRR, Trial Transcripts, 7/20/2021, Transcripts	157.30
7/29/21	Veritext LLC, Deposition Transcripts, 7/29/2021, 5129138	4,794.65

TOTAL EXPENSES \$ 25,545.09

MATTER TOTAL \$ 109,777.59



Invoice #: 248432 August 12, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
245391	6/07/21	29,108.60	.00	29,108.60
247613	7/09/21	100,646.34	.00	100,646.34

Previous Balance \$ 129,754.94

Total Due This Invoice \$128,046.88

TOTAL BALANCE DUE <u>\$257,801.82</u>

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 112 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

August 12, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 248432 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 128,046.88

Previous Balance \$129,754.94

TOTAL BALANCE DUE \$257,801.82

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 113 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

September 10, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through August 31, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 114 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

September 10, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 249870 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through August 31, 2021:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	29,375.50	.00	29,375.50
Total		33,019.50	23.11	33,042.61

TOTAL THIS INVOICE \$ 33,042.61

Previous Balance <u>\$128,046.88</u>

TOTAL BALANCE DUE \$ 161,089.49

Invoice #: 249870 September 10, 2021

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 116 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 249870 September 10, 2021



Invoice #: 249870 September 10, 2021

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
8/02/21	SRM	Analyze defendants' supplemental briefing; emails with J. Gutkoski and P. Zacharakis regarding same; attention to mediation dates and draft and file with Court letter to Judge Collings regarding same; attention to reply brief.	3.00
8/02/21	PKZ	Review Individual Defendant's Opposition; Emails from/to S. Magee and J. Gutkoski regarding Reply Brief for Supplemental Preliminary Injunction filing; Review Entity Defendants' Opposition to Preliminary Injunction Motion; Legal research for reply brief to preliminary injunction supplemental brief; Catalyst search for documents related to the G. Gregory Blue Sun account; Review A. Eilert, R. Glenister, and R. Gajewski affidavits in support of opposition to motion for preliminary injunction; Review deposition testimony and exhibits for reply brief	3.60
8/03/21	SRM	Legal research regarding issues for reply brief; emails with J. Gutkoski and P. Zacharakis regarding same.	4.00
8/03/21	PKZ	Prepare for Reply Brief and email to S. Magee and J. Gutkoski; Review S. Magee research summary relating to improper means; Emails from/to J. Gutkoski regarding reply brief	.85
8/04/21	SRM	Draft and edit motion for leave to file reply brief; work with E. Olson ; review record material for potential inclusion in proposed reply brief.	3.50
8/04/21	PKZ	Review S. Magee research email for reply brief; Review emails between customers and A. Eilert and email to S. Magee and J. Gutkoski with summary; Edit motion for leave of court to file reply brief and email to S. Magee and J. Gutkoski with comments; Review email and attachments from E. Olson	1.15
8/05/21	SRM	Review and analyze proposed reply brief; draft and file motion to impound; emails with opposing counsel regarding same.	1.40
8/05/21	PKZ	Review motion to file reply brief under seal	.10
8/06/21	SRM	Finalize proposed reply brief; review court order regarding motion to impound; emails with J. Gutkoski and P. Zacharakis regarding proposed reply brief and supporting record; work on record and declarations; finalize and file with Court motion for leave to file reply brief with proposed reply brief.	5.50

Invoice #: 249870 September 10, 2021

Date	Atty	Description	Hours
8/06/21	PKZ	Edit reply brief, insert record citations, and email to S. Magee and J. Gutkoski with comments; Draft and edit Zacharakis Declaration for Reply Brief (Mt for PI); Email to J. Gutkoski and S. Magee regarding Zacharakis Affidavit and additional exhibits for Reply Brief; Emails from/to J. Gutkoski and S. Magee regarding potential exhibits for reply brief; Edit Zacharakis Declaration, compile additional exhibits, and email to J. Gutkoski and S. Magee; Edit Rely Brief in support of Motion for Preliminary Injunction and email to J. Gutkoski and S. Magee	3.15
8/09/21	PKZ	Emails from/to J. Gutkoski and S. Magee regarding Scheduling Order; Review Defendants' Opposition to Motion for Leave to file Reply Brief	.40
8/10/21	MLM	Research and draft strategy email to S. Magee regarding breach of duty of loyalty	1.10
8/10/21	SRM	Scheduling call regarding discovery; emails with M. Mitchell regarding work on errata sheets; review, analyze and comment on answer to counterclaim.	2.30
8/10/21	PKZ	Draft Reply to Counterclaim; Call with J. Gutkoski and S. Magee regarding mediation preparation, scheduling order, and reply to counterclaim; Edit Reply to Counterclaim and email to S. Magee and J. Gutkoski; Draft E. Olson Errata Sheet; Email Draft and edit cover letter to Opposing Counsel with E. Olson errata sheet; Edit E. Olson Errata Sheet; Draft cover letter to Opposing Counsel with R. Schumann errata sheet; Draft R. Schumann Errata Sheet; Edit R. Schumann errata sheet; Email from/to S. Magee regarding R. Schumann errata sheet; Prepare remote notarization block for E. Olson Errata Sheet	4.30
8/11/21	SRM	Work on R. Schumann and E. Olson errata sheet issues; emails with P. Zacharakis regarding same; prepare for and attend call with client regarding mediation planning and discovery planning; update	2.50
8/11/21	PKZ	Legal research regarding damages; Email to E. Olson ; Client meeting regarding	1.40
8/12/21	SRM	Review entity defendants' answer to complaint; attention to emails regarding discovery scheduling; telephone conference with E. Olson	1.80
8/16/21	SRM	Teams call with client regarding preparation; prepare for same.	1.30
8/17/21	SRM	Attention to answer to counterclaim; emails with J. Gutkoski and P. Zacharakis regarding discovery schedule and strategy.	.80

Invoice #: 249870 September 10, 2021

Date	Atty	Description	Hours
8/17/21	PKZ	Research and email to S. Magee and J. Gutkoski regarding report; Email from/to S. Magee and J. Gutkoski regarding Reply to Counterclaim; Email to/from J. Gutkoski regarding scheduling proposal; Email from/to J. Gutkoski regarding Reply to Counterclaim; Edit Reply to Counterclaim and email to J. Gutkoski and S. Magee; Meet and Confer with opposing counsel regarding scheduling order; Legal research into damages	2.40
8/18/21	PKZ	Notarize, review, and dispatch E. Olson errata sheet package; Review and annotate Entity Defendants' Answer to Complaint; Edit Reply to Counterclaim and email to J. Gutkoski and S. Magee; Legal research into damages	1.45
8/19/21	SRM	Review, analyze, and comment on mediation memorandum; emails with J. Gutkoski and P. Zacharakis regarding same; edit, finalize, and file answer and counterclaim.	1.70
8/19/21	PKZ	Edit memo and email to J. Gutkoski and S. Magee with comments and regarding reply to counterclaim	.50
8/23/21	SRM	Review and analyze memorandum and order on motion for preliminary injunction; emails with J. Gutkoski and P. Zacharakis regarding same.	2.30
8/23/21	PKZ	Review Preliminary Injunction Order; Email to/from J. Gutkoski regarding and email to/from J. Tumilty and J. Dalton; Call with J. Marrow regarding and email to J. Marrow; Client meeting regarding Emails from/to Civil Clerk regarding posting bond and research	2.05
8/24/21	SRM	Telephone conference with J. Gutkoski, W. Prickett and R. Craig regarding language of preliminary injunction; telephone conference with J. Gutkoski regarding same; analysis of memorandum and order in response to defendants' inquiry.	1.10
8/24/21	PKZ	Email to J. Gutkoski, message to security bond; Emails from/to regarding setting up bond; Legal research into damages in preparation for mediation; Email from and email to J. Gutkoski regarding questions on bond application	1.90
8/25/21	PKZ	Emails to/from civil clerk regarding posting bond; Review Email from J. Gutkoski and Joint Rule 16.1 Statement and Proposed Scheduling Order; Email to J. Gutkoski and S. Magee regarding comments on Rule 16.1; Joint Statement and update on posting bond; Email to J. Gutkoski and S. Magee regarding posting bond; Legal research into ; Prepare notes to send to J. Gutkoski and S. Magee and email to J. Gutkoski and S. Magee; Email to regarding questions on process and pricing; Call with regarding ; Email from/to E. Olson and B. Mitchell regarding	3.00

Invoice #: 249870 September 10, 2021

Date	Atty	Description	Hours
8/26/21	SRM	Attend mediation; prepare for same; emails with J. Gutkoski and P. Zacharakis regarding same; research regarding injunction.	4.10
8/26/21	PKZ	Email to E. Olson and B. Mitchell regarding ; Emails from/to E. Olson regarding Email from/to C. Ross ; Attend Mediation; Email to J. Marrow ; Meeting with J. Marrow regarding ; Email from A. A. Dority regarding ; Email from A. A. Dority and review Personal Financial Statement; Email to C. Ross regarding and response from A. A. Dority	3.40
8/27/21	SRM	Review emails regarding posting of bond and settlement issues.	.30
8/27/21	PKZ	Emails from/to A. A. Dority and client regarding; Review email from E. Olson regarding Emails to KPM team regarding meeting with A. A. Dority and email to S. Magee and J. Gutkoski	.20
8/28/21	PKZ	Emails from/to C. Ross regarding; Email to A. A. Dority regarding	.10
8/30/21	SRM	Attention to redaction issues and email to clerk regarding same.	.30
8/30/21	PKZ	Prepare for call with A. A. Dority and C. Ross; Call with A. A. Dority and C. Ross regarding; Fill in bond application, emails to/from to J. Marrow regarding to/from J. Crawford with remaining questions and email to C. Ross with; Email to S. Magee and J. Gutkoski regarding update on bond payment; Email to J. Crawford regarding timeline for bond application; Emails from/to J. Gutkoski and S. Magee regarding redacting order	1.15
8/31/21	SRM	Attention to clarification motion filed by defendants and related correspondence.	.80
8/31/21	PKZ	Email to J. Gutkoski and S. Magee regarding proposed scheduling order; Draft Initial Disclosures	1.05

TOTAL PROFESSIONAL SERVICES \$ 29,375.50

MATTER TOTAL \$ 29,375.50



Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 122 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 249870 September 10, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
248432	8/12/21	128,046.88	.00	128,046.88

Previous Balance \$ 128,046.88

Total Due This Invoice \$33,042.61

TOTAL BALANCE DUE \$ 161,089.49

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 123 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

September 10, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 249870 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 33,042.61

Previous Balance \$128,046.88

TOTAL BALANCE DUE \$ 161,089.49

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 124 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

October 13, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through September 30, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 125 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

October 13, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 251212 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through September 30, 2021:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	17,787.00	452.96	18,239.96
Total		19,306.00	452.96	19,758.96

TOTAL THIS INVOICE \$ 19,758.96

Previous Balance \$33,042.61

TOTAL BALANCE DUE \$52,801.57

Invoice #: October 13, 2021

Invoice #: 251212 October 13, 2021

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
9/01/21	PKZ	Review Defendants' Motion for Clarification of Preliminary Injunction Order; Email to civil clerk regarding status on posting bond; Finish draft of initial disclosure; Email to J. Marrow with case update.	.90
9/02/21	SRM	Review proposed case schedule drafts; analyze and comment on both and application of to mediator; analyze KPM proposal to B. Wilt and comment on same; update J. Marrow regarding same.	1.30
9/02/21	PKZ	Edit Initial Disclosures; Email to J. Gutkoski and S. Magee regarding draft initial disclosures; Draft joint status report to mediator; Emails to defense counsel regarding joint status report to mediator; Edit joint status report to mediator; Incorporate defendants' edits to joint status report to mediator; Emails from/to S. Magee, J. Gutkoski, and clients regarding joint status report to mediator; Email to court enclosing joint status report to mediator.	1.90
9/07/21	SRM	Emails concerning opposition to motion for clarification; research and review cases regarding same; attention to various drafts of case schedule.	2.30
9/07/21	PKZ	Legal research regarding motion for reconsideration standard; Review proposed Local Rule 16.1 Joint Statement from R. Craig and email to J. Gutkoski with comments; Email from/to J. Gutkoski regarding R. Craig changed to Local Rule 16.1 Joint Statement	1.40
9/08/21	PKZ	Review and finalize Proposed Scheduling Order; Review and finalize Joint 16.1 Statement; Finalize and file Joint Rule 16.1 Statement and Proposed Scheduling Order; Email from/to S. Magee and J. Gutkoski regarding bond payment update	.70
9/09/21	SRM	Research regarding potential impact of preliminary injunction and related remedies.	3.50
9/09/21	PKZ	Email from/to B. Mitchell and E. Olson regarding Email from/to A.A. Dority regarding ; Email to C. Ross regarding ; Email from/to J. Gutkoski regarding draft initial disclosures; Email from/to S. Magee regarding possible outcome if Email to B. Mitchell, E. Olson, and C. Ross regarding ;	.60
9/10/21	SRM	Attention to Rule 16.1 statement; emails with P. Zacharakis regarding sample statement; review and comment on draft initial disclosures.	1.00

Invoice #: 251212 October 13, 2021

Date	Atty	Description	Hours
9/10/21	PKZ	Email from Court; emails from/to S. Magee and J. Gutkoski regarding additional 16.1 certificate; Email to defense counsel regarding Rule 16.1 certificate; Draft certificate pursuant to Rule 16.1; Edit certificate pursuant to Rule 16.1; Review and file certificate pursuant to Rule 16.1.	.90
9/12/21	SRM	Review and analyze draft opposition to motion for clarification.	.50
9/13/21	SRM	Review and comment on draft initial disclosures; emails regarding same.	.30
9/13/21	PKZ	Review and edit Opposition to Motion for Clarification; Finalize and file Opposition to Motion for Clarification; Emails from/to J. Gutkoski and S. Magee regarding Opposition to Motion for Clarification; Edit Initial Disclosures; email to S. Magee and J. Gutkoski regarding Initial Disclosures; serve KPM's initial disclosures to defense counsel; email to clients with final KPM initial disclosures.	1.00
9/14/21	SRM	Review Defendants' initial disclosures; review proposed counteroffer of settlement; emails with team regarding same.	.90
9/15/21	SRM	Analyze and review comments from team on counteroffer.	.60
9/15/21	PKZ	Review counteroffer document and email chain regarding defendants counteroffer; email to J. Gutkoski and S. Magee regarding initial thoughts; Email to C. Ross	.25
9/16/21	SRM	Conference with E. Olson, B. Mitchell, P. Zacharakis and J. Gutkoski regarding ; prepare for same; review and analyze Blue Sun/ITG counteroffer.	1.80
9/16/21	PKZ	Client meeting regarding ; email to Civil Clerk regarding filing bond; file bond.	.70
9/17/21	SRM	Telephone conference with P. Zacharakis and J. Gutkoski regarding plan for discovery; prepare for same; telephone conference with J. Marrow regarding status of case and settlement prospects.	2.10
9/17/21	PKZ	Prepare for meeting with J. Gutkoski and S. Magee; meeting with S. Magee and J. Gutkoski; draft Joint Statement to Judge Collings.	1.30
9/20/21	SRM	Review report to mediator; emails with clerk regarding unsealing; review issues concerning discovery.	2.00
9/20/21	PKZ	Compose list; compose list; edit second joint status report to mediator; email to/from opposing counsel regarding second joint statement to mediator; document review; call to G. Ritchie regarding second joint statement to mediator; email to/from civil clerk regarding second joint statement to mediator	4.70
9/21/21	SRM	Emails with P. Zacharakis and J. Gutkoski regarding additional discovery steps; review order from mediator;	.40
9/21/21	PKZ	Email from/to civil clerk regarding second joint statement to mediator; document review; emails from/to J. Gutkoski regarding and next steps	.50

Invoice #: 251212 October	13, 2021
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Date	Atty	Description	Hours
9/22/21	PKZ	; compose list; email to J. Gutkoski and S. Magee regarding customer list and letter to Defense Counsel to supplement production of documents; compose third party subpoena list with document request suggestions and email to J. Gutkoski and S. Magee	1.40
9/23/21	SRM	Analyze document requests and responses and objections from defendants; begin to outline demand letter concerning supplementation of responses; review analysis from P. Zacharakis regarding same.	3.00
9/24/21	SRM	Review supplemental initial disclosures from Blue Sun; attention to unsealing of memorandum and order on preliminary injunction; emails regarding same.	1.90
9/30/21	SRM	Draft letter to defendants' counsel regarding demand for supplemental discovery responses; emails with J. Gutkoski regarding same; review information regarding potential contempt by Blue Sun; emails with J. Gutkoski regarding same.	3.50

TOTAL PROFESSIONAL SERVICES

\$ 17,787.00

EXPENSES

Date	Description	Amount	
8/31/21	Thomson Reuters - West, Online research, 8/31/2021, 844823626	258.83	
8/31/21	Thomson Reuters - West, Online research, 8/31/2021, 844823626		
	TOTAL EXPENSES	\$ 452.96	
	MATTER TOTAL	\$ 18,239.96	
		. ,	
	TOTAL THIS INVOICE	\$ 19,758.96	
	TOTAL THIS INVOICE	φ 19,730.90	

Invoice #: 251212 October 13, 2021

OUTSTANDING INVOICES

ENDING	PAYMENTS	INVOICE	DATE	INVOICE
BALANCI	RECEIVED	TOTAL		NUMBER
33,042.61	.00.	33,042.61	9/10/21	249870

Previous Balance \$33,042.61

Total Due This Invoice \$19,758.96

TOTAL BALANCE DUE \$52,801.57

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 131 of 418



CityPoint
480 Totten Pond Road, 4th Floor
Waltham, MA 02451
morse.law
t -781-622-5930
f -781-622-5933
billing@morse.law

October 13, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 251212 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 19,758.96

Previous Balance \$33,042.61

TOTAL BALANCE DUE \$52,801.57

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website www.morse.law and click

"payments" at the bottom of the page.

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(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 132 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

November 10, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through October 31, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 133 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

November 10, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 253175 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through October 31, 2021:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	14,784.00	243.03	15,027.03
Total		17,925.50	17,495.53	35,421.03

TOTAL THIS INVOICE \$ 35,421.03

Previous Balance \$52,801.57

TOTAL BALANCE DUE \$88,222.60





Invoice #: 253175 November 10, 2021

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
10/04/21	SRM	Review and analyze P. Zacharakis's proposed additions to demand letter to defendants regarding supplementing discovery responses; attention to issues regarding	1.00
10/04/21	PKZ	Review Supplemental Initial Disclosures and compare to Initial Disclosure; summarize findings and email to S. Magee and J. Gutkoski; update list; email to J. Gutkoski and S. Magee with updated list; review and edit draft letter to defense counsel regarding supplemental responses to requests for production of documents; email comments to S. Magee and J. Gutkoski	1.10
10/05/21	SRM	Review J. Gutkoski edits to demand letter to Defendants regarding supplemental discovery; work on finalizing same; emails with P. Zacharakis regarding same; review order regarding motion for clarification; emails regarding	1.50
10/05/21	PKZ	Email to client ; email to S. Magee regarding J. Gutkoski edits to supplemental discovery letter to defense counsel; review court order denying defendants' motion for clarification; email from J. Gutkoski regarding order; finalize and dispatch letter requesting defendants' supplemental production of documents; email to clients regarding :	1.50
10/06/21	SRM	Attention to emails regarding and meet and confer.	.30
10/07/21	SRM	Attention to emails regarding	.40
10/07/21	PKZ	Emails from/to J. Gutkoski regarding meet and confer; Email to defense counsel regarding meet and confer; attend meet and confer; call with J. Gutkoski regarding meet and confer and next steps	.55
10/08/21	SRM	Telephone conference with client and J. Gutkoski and P. Zacharakis regarding ; prepare for same.	.90
10/08/21	PKZ	Meeting with J. Gutkoski, S. Magee and client regarding meet and confer with defense counsel and next steps	.35
10/11/21	SRM	Review and analyze defendants' motion for clarification; review injunction order and memorandum for relevance to same.	1.00
10/12/21	SRM	Emails with P. Zacharakis and J. Gutkoski regarding strategy for responding to motion for clarification; analyze same.	.50

Invoice #: 253175 November 10, 2021

Date	Atty	Description	Hours
10/12/21	PKZ	Research procedure for Motion to Show Cause; draft Proposed Order for Motion to Show Cause; Review and annotate Defendants' Second Motion for Clarification; Email to J. Gutkoski with comments and questions; Email to J. Gutkoski regarding deadline to oppose motion; Email to regarding cases for motion to show cause;	1.15
10/13/21	PKZ	Research into and email to J. Gutkoski and S. Magee with update on research	1.15
10/14/21	SRM	Research regarding cases and review; emails with J. Gutkoski and P. Zacharakis regarding same.	2.40
10/14/21	PKZ	Research standard and email summary to S. Magee and J. Gutkoski	.65
10/15/21	SRM	Emails with J. Gutkoski and P. Zacharakis regarding discovery planning; attention to demand to defendants to supplement discovery responses.	.50
10/18/21	SRM	Review and analyze materials concerning motion to clarify; emails with J. Gutkoski, P. Zacharakis and clients regarding same; attention to discovery follow up demand.	1.00
10/18/21	PKZ	Review emails; create outline; email to J. Gutkoski and S. Magee regarding research for Motion for Contempt; review for Motion for Contempt; email summary of documents to S. Magee and J. Gutkoski; Legal research for Motion for Contempt/Opposition to Second Motion for clarification	3.65
10/19/21	PKZ	Legal research into Motion for Contempt/Opposition to Motion for Clarification and email summary to J. Gutkoski and S. Magee; email from/to J. Gutkoski with requested case law	1.75
10/21/21	SRM	Analyze responses from defendants regarding supplemental discovery; emails with J. Gutkoski regarding same; review and analyze correspondence relevant to opposition to defendants' second motion for clarification; emails with J. Gutkoski and P. Zacharakis regarding same.	1.10
10/21/21	PKZ	Review emails from S. Magee and J. Gutkoski regarding entity defendants response to our discovery letter; Emails from/to S. Magee and J. Gutkoski regarding the scheduling order and email to Civil Clerk	.25
10/22/21	SRM	Emails regarding scheduling order and discovery planning; attention to opposition to motion for clarification and supporting documents.	1.80
10/22/21	PKZ	Emails from/to J. Gutkoski regarding KPM Declaration for Opposition to Motion for Clarification; draft KPM Declaration; prepare exhibits for declaration; email to J. Gutkoski with draft Declaration	1.15
10/25/21	SRM	Review and comment on draft opposition to motion for clarification; edit motion for contempt and to show cause; review and attention to exhibits for declaration of E. Olson; emails with P. Zacharakis and J. Gutkoski regarding same.	2.80

Invoice #: 253175 November 10, 2021

Date	Atty	Description	Hours
10/25/21	PKZ	Review draft Memo in Support of Contempt; Edit Opposition to Defendant's Second Motion for Clarification of Preliminary Injunction; Edit Proposed Order; Draft cover Motion for Contempt and Notice to Show Cause; Email from/to J. Gutkoski regarding defendants' supplemental initial disclosures; Review J. Gutkoski edits to Proposed Order; Email to J. Gutkoski and S. Magee regarding edits to Proposed Order; Edit E. Olson Declaration; Prepare Exhibits for Opposition/Motion for Contempt and for E. Olson Declaration; Email to E. Olson with ; call with E. Olson, J. Gutkoski, and S. Magee regarding ; Review and make final edits to E. Olson Declaration and Opposition to Second Motion for Clarification and Motion for Contempt; file entire Opposition/Motion package	5.00
10/26/21	SRM	Analysis of next steps in discovery; emails regarding same.	.60
10/26/21	PKZ	Emails from/to J. Gutkoski regarding status of discovery and next steps; review rule 16.1 certificate for proposed discovery limits;	.45
10/27/21	SRM	Review deposition notices; comment on discovery planning.	.60
10/27/21	PKZ	Draft notice of deposition for R. Glenister and A. Eilert; draft and edit cover letter serving notices of deposition; email to S. Magee and J. Gutkoski; Edit notices of deposition based on J. Gutkoski edits; edit cover letter' emails from/to S. Magee and J. Gutkoski regarding notices of deposition; skim results from target litigation on and email to J. Gutkoski and S. Magee; Review and dispatch cover letter and notices of deposition for R. Glenister and A. Eilert to all counsel of record.	1.50

TOTAL PROFESSIONAL SERVICES

\$ 14,784.00

EXPENSES

Date	Description	Amount
9/01/21	Thomson Reuters - West, Online research, 9/1/2021, 844986282	86.98
9/01/21	Thomson Reuters - West, Online research, 9/1/2021, 844986282	21.75
10/01/21	Thomson Reuters - West, Online research, 10/1/2021, 845150495	19.19
10/01/21	Thomson Reuters - West, Online research, 10/1/2021, 845150495	115.11

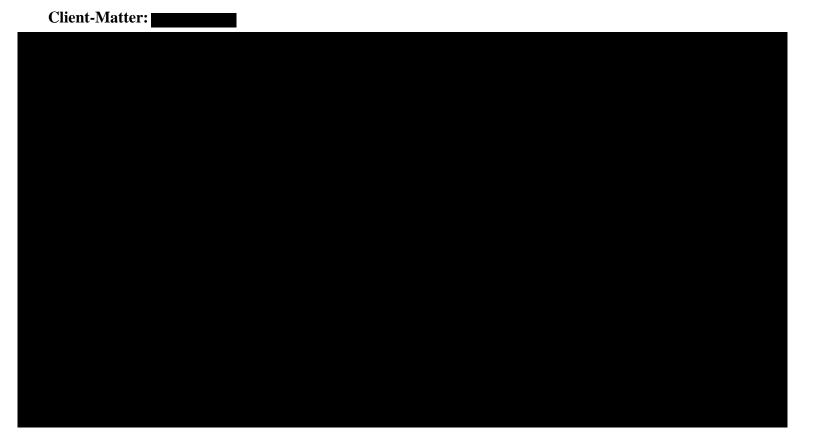
TOTAL EXPENSES

\$ 243.03

MATTER TOTAL

\$ 15,027.03

Invoice #: 253175 November 10, 2021



Invoice #: 253175 November 10, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
249870	9/10/21	33,042.61	.00	33,042.61
251212	10/13/21	19,758.96	.00	19,758.96

Previous Balance \$ 52,801.57

Total Due This Invoice \$ 35,421.03

TOTAL BALANCE DUE \$ 88,222.60

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 141 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

November 10, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 253175 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 35,421.03

Previous Balance \$52,801.57

TOTAL BALANCE DUE \$88,222.60

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website www.morse.law and click

"payments" at the bottom of the page.

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 142 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

December 8, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through November 30, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 143 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

December 8, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 254386 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through November 30, 2021:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	11,154.00	.00	11,154.00
Total		13,223.00	.00	13,223.00

TOTAL THIS INVOICE \$ 13,223.00

Previous Balance \$ 35,421.03

TOTAL BALANCE DUE <u>\$48,644.03</u>



Invoice #: 254386 December 8, 2021

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
11/02/21	PKZ	Email from/to J. Gutkoski regarding A. Eilert and R. Glenister deposition preparation	.10
11/03/21	SRM	Emails regarding depositions.	.40
11/03/21	PKZ	Email from/to W. Prickett and email to/from J. Gutkoski and S. Magee regarding	.20
11/04/21	SRM	Attention to emails regarding depositions; review and analyze order regarding scope of discovery event limitations; emails regarding same.	.90
11/04/21	PKZ	Email from/to J. Gutkoski and S. Magee regarding scheduling R. Glenister and A. Eilert depositions; Review court scheduling order and emails from S. Magee and J. Gutkoski;	.45
11/07/21	PKZ	Email to J. Gutkoski and S. Magee regarding deposition dates for A. Eilert and R. Glenister	.05
11/09/21	PKZ	Review and annotate Defendants' Opposition to Motion for Contempt and email to S. Magee and J. Gutkoski with notes/comments; draft and edit R. Glenister and A. Eilert second deposition notice; draft and edit cover letter dispatching R. Glenister and A. Eilert second notice of deposition; emails from/to J. Gutkoski regarding R. Glenister and A. Eilert second notice of deposition and first request for documents to Blue Sun; Review and dispatch second notices of deposition for R. Glenister and A. Eilert;	1.65
11/10/21	PKZ	Deposition preparation for A. Eilert and R. Glenister	2.60
11/11/21	PKZ	Email to J. Gutkoski and S. Magee regarding deposition preparation; exhibit preparation for A. Eilert and R. Glenister depositions; schedule depositions with Veritext; dispatch and share A. Eilert proposed deposition exhibits;	6.05
11/12/21	PKZ	A. Eilert and R. Glenister deposition exhibit preparation; emails from/to J. Gutkoski and S. Magee regarding deposition exhibits	2.45
11/15/21	SRM	Review and analyze draft reply brief; attention to deposition exhibits and related materials from P. Zacharakis.	2.50
11/15/21	PKZ	Review emails between E. Olson and J. Gutkoski regarding; add exhibits to A. Eilert's list; complete R. Glenister deposition exhibit prep; Emails from/to J. Gutkoski regarding Portuguese pdf; Emails from/to J. Gutkoski regarding Blue Sun website screen shots;	2.55
11/16/21	PKZ	Review emails from/to J. Gutkoski and E. Olson; prepare for A. Eilert deposition; attend A. Eilert deposition; Email to J. Gutkoski	5.85

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 146 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 254386 December 8, 2021

Date	Atty	Description	Hours
11/17/21	PKZ	Edit Reply Memo in support of Motion for Contempt and email to J. Gutkoski and S. Magee; emails from/to J. Gutkoski and file Reply brief	.60
11/19/21	SRM	Emails with P. Zacharakis regarding status of depositions.	.30
11/19/21	PKZ	Prepare for R. Glenister deposition; attend R. Glenister deposition	5.10

TOTAL PROFESSIONAL SERVICES	\$ 11,154.00
MATTER TOTAL	\$ 11,154.00
TOTAL THIS INVOICE	\$ 13,223.00

Invoice #: 254386 December 8, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
253175	11/10/21	35,421.03	.00	35,421.03

Previous Balance \$ 35,421.03

Total Due This Invoice \$13,223.00

TOTAL BALANCE DUE \$48,644.03

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 148 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

December 8, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 254386 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 13,223.00

Previous Balance \$ 35,421.03

TOTAL BALANCE DUE \$48,644.03

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website www.morse.law and click

"payments" at the bottom of the page.

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 149 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

January 13, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through December 31, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 150 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

January 13, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 256124 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through December 31, 2021:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	13,084.50	2,095.45	15,179.95
Total		15,824.00	2,998.45	18,822.45

TOTAL THIS INVOICE \$ 18,822.45

Previous Balance \$ 13,223.00

TOTAL BALANCE DUE \$ 32,045.45

Please be advised that effective January 1, 2022, we will be raising our hourly rates. Please do not hesitate to call us if you have any questions about our rates on your bill.



Invoice #: 256124 January 13, 2022

Invoice #: 256124 January 13, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
12/08/21	PKZ	Emails from/to J. Gutkoski, S. Magee and N. Zoltowski, and	.80
12/09/21	PKZ	Prepare for and attend discovery meeting with S. Magee and J. Gutkoski; Email from/to J. Gutkoski, S. Magee and damages expert regarding and	.65
		email to defense counsel with consent to be bound by protective order signed by damages expert	
12/09/21	PKZ	Email from/to J. Gutkoski, S. Magee and damages expert regarding	.15
12/10/21	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding discovery planning; prepare for same.	.90
12/10/21	PKZ	Emails from/to Veritext regarding A. Eilert deposition transcript, email to J. Gutkoski regarding A. Eilert and R. Glenister deposition transcripts/exhibits, email to S. Magee regarding review and save R. Glenister deposition transcripts and exhibits	.55
12/13/21	PKZ	Email from/to J. Gutkoski regarding meeting damages expert tomorrow, email to Veritext regarding A. Eilert deposition transcript, and email to S. Magee regarding	.15
12/14/21	SRM	Prepare for call with StoneTurn.	.50
12/14/21	PKZ	Email to/from Target Litigation regarding status of greview information received from Target Litigation regarding emails to/from J. Gutkoski and S. Magee regarding next steps for hard drive information; schedule meeting with damages expert; review protective order; email to J. Gutkoski regarding protective order and damages expert receiving deposition transcripts; review and save A. Eilert deposition transcripts and exhibits;	1.40
		email to damages expert and meeting today; email from/to J. Gutkoski, S. Magee, and damages expert regarding	
12/15/21	SRM	Attend motion hearing on contempt; review and analyze briefs concerning contempt hearing; emails with J. Gutkoski and P. Zacharakis regarding preparation for hearing; post-hearing call with J. Gutkoski, P. Zacharakis and C. Ross.	4.00

Invoice #: 256124 January 13, 2022

Date	Atty	Description	Hours
12/15/21	PKZ	Email from/to client review motion for clarification and motion for contempt papers; emails from/to S. Magee and J. Gutkoski regarding contempt hearing; attend hearing on motion for contempt and second motion for clarification of preliminary injunction order; meeting with S. Magee, J. Gutkoski, and C. Ross regarding hearing	2.55
12/16/21	SRM	Teams meeting with Stone Turn experts, J. Gutkoski and P. Zacharakis; prepare for same.	1.30
12/16/21	PKZ	Email to S. Magee and J. Gutkoski regarding hard drive; prepare for damages expert meeting; draft subpoena to M. Gajewski;	2.00
12/17/21	PKZ	Pull for damages expert and send to damages expert; email to damages expert ; review decision on motion for contempt and second motion for reconsideration; review revised preliminary injunction order; emails from J. Gutkoski and client	2.30
12/20/21	SRM	Attention to emails regarding additional discovery to defendants and hard drive.	.50
12/20/21	PKZ	Email from/to J. Gutkoski regarding hard drive; email to/from Target Litigation regarding; edit for M. Gajewski subpoena; draft and edit notice of subpoena for M. Gajewski; email to J. Gutkoski and S. Magee regarding M. Gajewski subpoena document; draft and edit request for documents to I. Lucas; draft and edit request for documents to R. Glenister; draft and edit request for documents to R. Gajewski; email to S. Magee and J. Gutkoski regarding requests for documents to individual defendants; call with J. Gutkoski regarding	4.75
12/21/21	SRM	Numerous emails regarding hard drive documents.	.80
12/21/21	PKZ	Emails from/to Target Litigation regarding and email to S. Magee and J. Gutkoski regarding which documents to upload	.70
12/22/21	SRM	Emails regarding discovery topics and R. Gajewski hard drive.	.40
12/22/21	PKZ	Emails from/to J. Gutkoski and S. Magee regarding hard drive and email to Target Litigation	.10

Invoice #: 256124 January 13, 2022

Date	Atty	Description	Hours
12/23/21	PKZ	Review documents from Stoneturn and email to/from J. Gutkoski and S. Magee regarding individual defendants' request for documents; draft and edit subpoena for documents to M. Gajewski; edit M. Gajewski deposition subpoena, schedule A, and notice of subpoena; email to J. Gutkoski and S. Magee with updated M. Gajewski subpoena package; email to target litigation regarding ; R. Gajewski hard drive document review; and movie/video review	3.50
12/27/21	PKZ	Document review	3.30
12/28/21	SRM	Emails regarding review of R. Gajewski hard drive documents with P. Zacharakis.	.30
12/28/21	PKZ	Emails from/to J. Gutkoski and S. Magee regarding edits to individual defendants request for documents and M. Gajewski subpoena; email to/from Target Litigation regarding videos/images on R. Gajewski's hard drive; email to S. Magee and J. Gutkoski regarding ; Email to J. Gutkoski regarding edits to individual defendants' request for documents; Edit Schedule A for M. Gajewski's deposition subpoena; document review in preparation for M. Gajewski deposition	1.75
12/29/21	PKZ	Edit Schedule A for M. Gajewski deposition subpoena; finalize subpoena package to M. Gajewski; email to J. Gutkoski regarding M. Gajewski subpoena package; email to/from K. Olson regarding service of M. Gajewski subpoenas; dispatch M. Gajewski Subpoena for documents to opposing counsel	.75
12/30/21	SRM	Emails regarding subpoena to M. Gajewski and discovery topics.	.60
12/30/21	PKZ	Email from/to W. Prickett regarding accepting service in M. Gajewski's behalf; emails from/to J. Gutkoski regarding W. Prickett accepting service for M. Gajewski;	.30

TOTAL PROFESSIONAL SERVICES

\$ 13,084.50

EXPENSES

Date	Description	Amount
11/01/21	Thomson Reuters - West, Online research, 11/1/2021, 845321843	63.90
11/01/21	Thomson Reuters - West, Online research, 11/1/2021, 845321843	153.35
12/01/21	Thomson Reuters - West, Online research, 12/1/2021, 845487045	113.80
12/14/21	Veritext LLC, Litigation Support Vendors, 12/14/2021, 5449826	1,699.40
12/30/21	Michelle Gajewski, Witness fees, 12/30/2021, Witness Fee	40.00
12/30/21	Legal Process Servers, LLC, Litigation Support Vendors, 12/30/2021, 1205701-01	25.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 156 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 256124		January 13, 2022
	TOTAL EXPENSES	\$ 2,095.45
	MATTER TOTAL	\$ 15,179.95
	TOTAL THIS INVOICE	\$ 18.822.45

Invoice #: 256124 January 13, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
254386	12/08/21	13,223.00	.00	13,223.00

Previous Balance \$ 13,223.00

Total Due This Invoice \$18,822.45

TOTAL BALANCE DUE \$32,045.45

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 158 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

January 13, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 256124 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 18,822.45

Previous Balance \$ 13,223.00

TOTAL BALANCE DUE \$32,045.45

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website www.morse.law and click

"payments" at the bottom of the page.

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

(USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 159 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

February 7, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through January 31, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 160 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

February 7, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 257468
Client #: 10255
Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through January 31, 2022:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	6,043.75	169.05	6,212.80
Total		8,822.25	169.05	8,991.30

TOTAL THIS INVOICE

\$ 8,991.30

Please be advised that effective January 1, 2022, we have raised our our hourly rates. Please do not hesitate to contact us if you have any questions about our rates on your bill.

Invoice #: 257468 February 7, 2022



Invoice #: 257468 February 7, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
1/04/22	PKZ	Emails from/to J. Gutkoski regarding individual defendants' document requests; Edit R. Glenister and I. Lucas requests for documents	1.55
1/05/22	SRM	Review draft document requests to individual defendants.	.60
1/05/22	PKZ	Draft and edit cover letter to W. Prickett regarding M. Gajewski subpoenas and email to J. Gutkoski and S. Magee	.40
1/06/22	SRM	Attention to draft document requests to individual defendants.	.30
1/06/22	PKZ	Email to J. Smith regarding service of M. Gajewski subpoena; edits to W. Prickett cover letter and email to J. Gutkoski; emails from/to J. Gutkoski regarding R. Glenister request for documents; edit R. Glenister request for documents; email to opposing counsel with M. Gajewski subpoenas; edit A. Eilert request for documents; edit R. Gajewski request for documents; and edit I. Lucas request for documents	1.70
1/07/22	PKZ	Edits to individual defendants' request for documents and email to J. Gutkoski and S. Magee	.55
1/10/22	PKZ	Edit R. Gajewski, A. Eilert, and I. Lucas' requests for production of documents and email from/to J. Gutkoski	.55
1/11/22	SRM	Attention to final document requests to individual defendants.	.20
1/11/22	PKZ	Draft and edit cover letter to counsel and finalize and dispatch request for documents to A. Eilert, R. Glenister, I. Lucas, and R. Gajewski; Email to J. Gutkoski	.70
1/12/22	SRM	Emails regarding	.20
1/14/22	SRM	Review and analyze letter from M. Gajewski's counsel regarding objections to subpoena; emails regarding same; emails regarding extension of schedule.	1.10
1/14/22	PKZ	Emails from/to J. Gutkoski regarding extending scheduling order, request for production of documents to the entity defendants and letter regarding M. Gajewski's document responses; emails to E. Olson regarding	.55
1/18/22	SRM	Attention to motion to amend scheduling order; review emails regarding same.	.30
1/18/22	PKZ	Emails from/to J. Gutkoski regarding Defendants' draft consented to motion to extend the scheduling order; review Defendants' draft consented to motion to extend the tracking order; emails from/to Veritext regarding invoices.	.50
1/20/22	SRM	Review amended scheduling order.	.20

Invoice #: 257468	Febr	ruary 7, 2022

Date	Atty	Description	Hours
1/20/22	PKZ	Email from/to and emails to/from J. Gutkoski regarding M. Gajewski deposition	.10
1/25/22	PKZ	Emails to/from J. Gutkoski regarding M. Gajewski deposition, email to confirming new date for M. Gajewski deposition and email to Veritext scheduling M. Gajewski deposition	.30
1/26/22	PKZ	M. Gajewski deposition exhibit preparation and email to J. Gutkoski with explanation of	1.00
1/28/22	SRM	Attention to emails regarding M. Gajewski deposition exhibits.	.20
1/28/22	PKZ	Finalize deposition exhibits for M. Gajewski deposition and emails from/to J. Gutkoski regarding deposition exhibits	.60
1/31/22	SRM	Initial review of document requests and interrogatories served by Blue Sun.	.50
1/31/22	PKZ	Prepare for and attend M. Gajewski deposition; call with J. Gutkoski regarding recap of M. Gajewski deposition and next steps; email to J. Gutkoski regarding responding to discovery requests	3.15

TOTAL PROFESSIONAL SERVICES

\$ 6,043.75

EXPENSES

Date	Description	Amount
1/01/22	Thomson Reuters - West, Online research, 1/1/2022, 845676260	169.05
	TOTAL EXPENSES	\$ 169.05
	MATTER TOTAL	\$ 6,212.80
	TOTAL THIS INVOICE	\$ 8,991.30

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 165 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

February 7, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

Invoice #: 257468 Client #: 10255 Billing Attorney: **JCM**

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE

\$8,991.30

Make checks payable to: Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website www.morse.law and click

"payments" at the bottom of the page.

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments:

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INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 166 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

March 7, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through February 28, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 167 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

March 7, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 258917 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through February 28, 2022:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	17,212.00	9.98	17,221.98
Total		17,212.00	19.78	17,231.78

TOTAL THIS INVOICE \$ 17,231.78

Previous Balance \$ 8,991.30

TOTAL BALANCE DUE \$ 26,223.08

Invoice #: 258917 March 7, 2022

Invoice #: 258917 March 7, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
2/01/22	PKZ	Edit draft Request for Production of Documents to Blue Sun and email to J. Gutkoski; call with J. Gutkoski regarding Request for Production of Documents to entity defendants; edit and dispatch final Request for Production of Documents to entity defendants; draft and edit cover letter for Request for Production of Documents to entity defendants; draft responses to request for production of documents;	1.30
2/02/22	PKZ	Draft responses to request for documents and add comments to requests; draft answers to interrogatories and add comments to interrogatories	2.20
2/09/22	SRM	Review and analyze document requests and interrogatories from Blue Sun; videoconference with experts and clients	3.00
2/10/22	PKZ	Draft responses to requests for documents and draft answers to interrogatories; email to J. Gutkoski and S. Magee regarding number of interrogatories	5.85
2/11/22	PKZ	Edit responses to request for documents compared to S. Magee's notes from meeting; emails from/to J. Gutkoski regarding responses to discovery requests and update on client meeting; email from/to D. Wilson with responses to request for documents from individual defendants;	1.10
2/14/22	SRM	Review and analyze defendants' document request responses.	.90
2/14/22	PKZ	Review individual defendants' responses to request for documents and email to J. Gutkoski and S. Magee edit answers to interrogatories email from/to J. Gutkoski regarding setting up meet and confer with defendants; edits responses to request for documents based on J. Gutkoski notes; email to D. Wilson regarding scheduling a meet and confer for individual defendants responses to request for production of documents	3.50
2/15/22	PKZ	Emails from/to D. Wilson regarding individual defendants document production and emails to target litigation with document production for upload; emails from/to D. Wilson regarding scheduling meet and confer meeting and email to/from J. Gutkoski and S. Magee regarding thoughts on scheduling meet and confer	.20

Invoice #: 258917 March 7, 2022

Date	Atty	Description	Hours
2/16/22	PKZ	Email from W. Prickett and email to J. Gutkoski and S. Magee regarding scheduling meet and confer for individual defendants' responses to request for documents; Edit answers to interrogatories; email draft answers to interrogatories to S. Magee and J. Gutkoski	2.45
2/17/22	SRM	Review and analyze draft responses to document requests; review and analyze document collection emails with J. Gutkoski and P. Zacharakis regarding same; prepare for telephone conference with E. Olson	1.80
2/18/22	SRM	Videoconference with E. Olson, W. Anderson and C. Ross regarding ; prepare for same; prepare summary of same to circulate; emails with team regarding same; videoconference regarding damages information for expert.	4.30
2/18/22	PKZ	Email from/to S. Magee and J. Gutkoski regarding most recent responses to request for documents	.10
2/22/22	PKZ	Email from W. Prickett and email to J. Gutkoski and S. Magee regarding meet and confer regarding individual defendant responses to requests for documents; review individual defendants' second production of documents	1.00
2/23/22	SRM	Videoconference with Stoneturn and client regarding damages information; meet and confer with W. Prickett, J. Gutkoski and P. Zacharakis regarding defendants' responses to discovery; prepare for all of the above; emails with E. Olson regarding	2.60
2/23/22	PKZ	Finish review of individual defendants' document production and email summary to J. Gutkoski and S. Magee; email to Y. Zhao regarding prepare for meet and confer with W. Prickett; call with J. Gutkoski and S. Magee in preparation for meet and confer with W. Prickett; meet and confer with W. Prickett; edit responses to request for documents from Blue Sun	4.45
2/24/22	PKZ	Edit responses to request for documents and email to S. Magee and J. Gutkoski	.80
2/25/22	PKZ	Emails from/to S. Magee regarding discovery deadlines; emails from/to S. Magee regarding document review preparation; review emails regarding and emails from/to E. Olson, S. Magee, and J. Gutkoski; Email from/to S. Magee regarding correspondence and email to target litigation regarding correspondence	.50
2/27/22	SRM	Attention to emails regarding status of documents for production.	.30
2/28/22	SRM	Work on new round of document production; review documents provided by E. Olson for production; telephone conference with P. Zacharakis regarding same; review and analysis of new documents for production.	3.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 171 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 258917	March 7, 2022

Date A	Atty	Description	Hours
2/28/22 F	PKZ	Document review; emails from/to target litigation regarding and email to S. Magee regarding and review; emails from/to target litigation, S. Magee and J. Gutkoski regarding status of document searches	.55
EXPENSES		TOTAL PROFESSIONAL SERVICES	\$ 17,212.00

TOTAL EXPENSES

Thomson Reuters - West, Online research, 2/1/2022, 845838329

Date Description

2/01/22

\$ 9.98

Amount

9.98

MATTER TOTAL

\$ 17,221.98

TOTAL THIS INVOICE

\$ 17,231.78

Invoice #: 258917 March 7, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
257468	2/07/22	8,991.30	.00.	8,991.30

Previous Balance \$8,991.30

Total Due This Invoice \$17,231.78

TOTAL BALANCE DUE \$26,223.08

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 173 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

March 7, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 258917 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 17,231.78

Previous Balance \$8,991.30

TOTAL BALANCE DUE \$26,223.08

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website **www.morse.law** and click

"payments" at the bottom of the page.

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments: (USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 174 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

April 11, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through March 31, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 175 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

April 11, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 260176 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through March 31, 2022:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	37,751.50	1.60	37,753.10
Total		38,017.50	1.60	38,019.10

TOTAL THIS INVOICE \$ 38,019.10

Previous Balance \$ 17,231.78

TOTAL BALANCE DUE \$55,250.88

Invoice #: 260176 April 11, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
3/01/22	SRM	Numerous emails with J. Rubel regarding; telephone conferences with P. Zacharakis and J. Gutkoski regarding same; analyze existing documents for production purposes; review draft responses to document requests.	5.10
3/01/22	PKZ	Emails from/to S. Magee and target litigation regarding ; email to M. Mitchell regarding review of documents relating to issue; prepare for call with S. Magee and J. Gutkoski regarding document collection and searching; meeting with M. Mitchell regarding ; email to S. Magee regarding discussion with M. Mitchell; emails from/to target litigation regarding ; conference with S. Magee and J. Gutkoski regarding document collection and sorting; prepare chart and email to S. Magee regarding documents; call with S. Magee regarding document review ; Edit responses to Request for documents based on J. Gutkoski comments and email to J. Gutkoski and S. Magee; begin document review for second responses to request for documents	4.15
3/02/22	SRM	Review and comment on answers to interrogatories; edit responses to document requests and email to J. Gutkoski and P. Zacharakis regarding same.	3.80
3/02/22	PKZ	Document review for ; Emails from/to client regarding ; Review and edit answers to interrogatories and email from/to J. Gutkoski and S. Magee; Emails from/to client regarding ; Edit responses to request for documents; Finalize and dispatch answers to interrogatories and responses to request for documents; Call with client regarding ; Document review	5.55
3/03/22	PKZ	Final document review for second production; Email to clients with	.15
3/03/22	PKZ	Emails from target litigation with and email to J. Gutkoski with	.10

Invoice #: 260176 April 11, 2022

Date	Atty	Description	Hours
3/04/22	PKZ	Email from/to J. Gutkoski regarding ; review from target litigation, and email to J. Gutkoski and S. Magee with proposed ; review KPM 30(b)(6) deposition notice; call with J. Gutkoski regarding search terms; email to target litigation with	2.05
3/07/22	PKZ	Emails from/to target litigation, S. Magee, and J. Gutkoski regarding; Call with S. Magee regarding search results; Document review and Review from target litigation and email to S. Magee and J. Gutkoski	2.40
3/08/22	SRM	Emails regarding settlement issues; emails with J. Marrow regarding same.	.50
3/08/22	PKZ	Emails from S. Magee and J. Gutkoski regarding search terms; email to target litigation regarding; email to client regarding ; email to J. Gutkoski and S. Magee regarding 30(B)(6) deposition notice objection letter; review and annotate Blue Sun and ITG's responses to KPM's discovery requests and email comments to J. Gutkoski and S. Magee and Draft opposition letter to 30(b)(6) notice	3.60
3/09/22	PKZ	Emails to/from client regarding; email from J. Gutkoski regarding; finish draft 30(b)(6) objection letter; edit 30(b)(6) objection letter and Email to J. Gutkoski and S. Magee regarding document collection	3.55
3/10/22	PKZ	Review from client and email to J. Gutkoski and S. Magee; Document Review; emails from/to J. Gutkoski and S. Magee regarding possible deponents and Email to client	3.05
3/11/22	PKZ	Emails from/to J. Gutkoski regarding and objection letter; email to damages expert ; email to damages expert; Edit objection letter to include issues with the entity defendants' responses to request for documents; email to S. Magee regarding email to Target Litigation regarding ; email to client regarding ; Call with J. Gutkoski regarding discovery status and next steps; email to Target Litigation regarding and Call with target litigation regarding	6.30
3/13/22	SRM	Review numerous emails and issues regarding depositions, document production, discovery deadlines.	1.50
3/13/22	PKZ	Emails from/to J. Gutkoski regarding entity defendants' production of documents; email from G. Ritchie regarding meet and confer; email to target litigation regarding entity; document review	1.10
3/14/22	SRM	Emails regarding document request and issues; emails with P. Zacharakis and J. Gutkoski regarding discovery.	.50

Invoice #: 260176 April 11, 2022

Date	Atty	Description	Hours
3/14/22	PKZ	Emails from/to J. Gutkoski, S. Magee, and target litigation regarding entity defendants' production of documents and scheduling meet and confer; email to defense counsel regarding scheduling meet and confer and requesting documents with metadata; emails to/from clients regarding; emails from/to target litigation regarding the rules; document review	1.90
3/15/22	SRM	Telephone conference regarding search terms; telephone conference regarding deposition scheduling; emails regarding same.	1.70
3/15/22	PKZ	Call with S. Magee and J. Gutkoski regarding status of document search terms and review; email to target litigation regarding ; client meeting regarding	1.55
3/16/22	SRM	Attention to document production decisions; emails with P. Zacharakis regarding same.	1.50
3/16/22	PKZ	Emails from/to J. Gutkoski regarding Blue Sun and ITG's ; brainstorm and email to S. Magee and J. Gutkoski; document review; review email from target litigation; email to/from target litigation regarding	5.00
3/17/22	SRM	Attention to discovery issues and related emails.	1.10
3/17/22	PKZ	Prepare for meet and confer with G. Ritchie and J. Gutkoski; meet and confer with G. Ritchie and J. Gutkoski; call with J. Gutkoski regarding next steps after meet and confer; email to G. Ritchie with metadata form; email to M. Boom regarding expert documents; call with M. Boom regarding expert ; call with S. Magee regarding call with M. Boom and meet and confer with G. Ritchie and J. Gutkoski; review entity defendants' request for financial documents and email to S. Magee; review from M. Boom and email to M. Boom; emails from/to target litigation regarding; email to client regarding	5.90
3/18/22	SRM	Telephone conference with E. LeBlanc regarding R. Geis subpoena; prepare for same; attention to emails regarding discovery issues.	1.00
3/18/22	PKZ	Emails to/from target litigation confirming ; document review; prepare for part 2 of the meet and confer with G. Ritchie and J. Gutkoski; part 2 of the meet and confer with G. Ritchie and J. Gutkoski; call with J. Gutkoski regarding meet and confer with G. Ritchie; draft and edit joint motion to extend scheduling order; draft and edit proposed amended scheduling order and Email to opposing counsel with first production of documents	3.85
3/21/22	SRM	Attention to Rule 30(b)(6) deposition topics; attention to R. Geis deposition planning; review joint motion to amend scheduling order; attention to deposition planning.	1.50

Invoice #: 260176 April 11, 2022

Date	Atty	Description	Hours
3/21/22	PKZ	Email to J. Gutkoski and S. Magee regarding draft 30(b)(6) KPM objection letter;	1.15
		joint motion to amend scheduling order and proposed order, email to clients, and email to opposing counsel for approval; email to client regarding and Draft email to B. Marcello	
2/22/22	CD14		1.10
3/22/22	SRM	Review and analyze for relevance to deposition; emails regarding document production and planning.	1.10
3/22/22	PKZ	Prepare for and call to B. Marcello ; emails from/to J. Gutkoski regarding status of document searches; email to client regarding ; emails to/from target litigation with ; email to G. Ritchie regarding metadata request; document review and Emails to/from M. Boom asking for	1.75
3/23/22	SRM	Emails regarding planning for document production; attention to discovery schedule and motion to extend discovery schedule.	.80
3/23/22	PKZ	Emails to/from defense counsel regarding draft joint motion to amend the scheduling order; email from/to J. Gutkoski regarding amended scheduling order; edit joint motion to amend scheduling order and proposed order and emails to/from J. Gutkoski and Call to R. Brady regarding B. Marcello deposition	.80
3/24/22	SRM	Telephone conference with K. Pickering ; email with team regarding same.	.40
3/24/22	PKZ	Finalize and file joint motion to amend scheduling order and proposed second amended scheduling order; call with R. Brady regarding B. Marcello's deposition; email to client regarding and Email from G. Ritchie and email	.60
		to target litigation regarding	
3/25/22	SRM	Emails regarding discovery schedule, deposition planning, Blue Sun document production.	.50
3/25/22	PKZ	Email to client regarding entity defendants' production of documents and Email to G. Ritchie regarding reproduction of entity defendants' documents with metadata	.35
3/28/22	SRM	Emails regarding deposition scheduling and document productions.	.50

Invoice #: 260176 April 11, 2022

Date	Atty	Description	Hours
3/28/22	PKZ	Email to/from target litigation regarding; email to/from client regarding call with E. Olson regarding document email to S. Magee regarding call with E. Olson; email to J. Gutkoski regarding call with E. Olson; Draft Blue Sun deposition notice; Draft ITG deposition notice; Draft I. Lucas deposition notice; Draft subpoena for D. Evans deposition; email to S. Magee and J. Gutkoski with draft deposition notices and subpoena; email to S. Magee with ; document review and Call	4.30
3/29/22	SRM	with J. Rubel regarding Telephone conference with J. Gutkoski and P. Zacharakis regarding deposition preparation; prepare for same.	.90
3/29/22	PKZ	Email to R. Brady regarding follow up for deposition of B. Marcello; Call with J. Gutkoski and S. Magee regarding depositions; Email to M. Smith regarding deposition; Draft subpoena for testimony to W. Brown; Draft subpoena for documents for D. Evans (with schedule A); Draft notice of deposition for D. Evans; Email to J. Gutkoski with third-party subpoenas; Email to target litigation regarding ; Document review; Call with B. Marcello regarding deposition representation; Email to J. Gutkoski and S. Magee with summary of call with B. Marcello; Email to J. Gutkoski and S. Magee regarding ; Call with J. Gutkoski regarding Call with Gatkoski regarding Call with C	4.70
3/30/22	PKZ	Draft email to G. Ritchie regarding narrowing documents and email to J. Gutkoski and S. Magee; Finalize and dispatch email relating to limiting documents to G. Ritchie; Document review; Call with J. Gutkoski regarding E. Weinstein; Emails to/from E. Weinstein; Emails from/to target litigation regarding Email to J. Gutkoski and S. Magee regarding scheduling E. Weinstein deposition and Email to G. Ritchie regarding proposed deposition date for E. Weinstein	4.60
3/31/22	PKZ	Email to R. Brady and B. Marcello regarding B. Marcello deposition; Document review; Email to target litigation regarding ; Emails from/to G. Ritchie's office regarding missing time information on documents; Emails from/to target litigation ; Call with B. Marcello regarding deposition representation; Email to defense counsel confirming deposition representation and date for B. Marcello; and Email to J. Gutkoski regarding C. McIntire deposition date and deposition scheduling	4.45

TOTAL PROFESSIONAL SERVICES

\$ 37,751.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 182 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 260176 April 11, 2022

EXPENSES

Date	Description	Amount
2/28/22	JND Quarterly Pacer charges	1.60
	TOTAL EXPENSES	\$ 1.60
	MATTER TOTAL	\$ 37,753.10
	TOTAL THIS INVOICE	\$ 38.019.10

Invoice #: 260176 April 11, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
258917	3/07/22	17,231.78	.00	17,231.78

Previous Balance \$ 17,231.78

Total Due This Invoice \$38,019.10

TOTAL BALANCE DUE \$55,250.88

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 184 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

April 11, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 260176 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 38,019.10

Previous Balance \$17,231.78

TOTAL BALANCE DUE \$55,250.88

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website www.morse.law and click

"payments" at the bottom of the page.

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments: (USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 185 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

May 6, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 261338 Client #: 10255 Matter #: 36384 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics-NIR Senry

For professional services rendered through April 30, 2022:

Professional Services	\$ 40,997.25
Total Expenses	\$ 7,061.98
TOTAL THIS INVOICE	\$ 48,059.23
Previous Balance	\$ 55,250.88
TOTAL BALANCE DUE	\$ 103,310.11

Invoice #: 261338 May 6, 2022

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
4/01/22	PKZ	Email to G. Ritchie regarding E. Weinstein deposition and feedback on email relating to limiting document production; Document review; Email from/to J. Gutkoski regarding G. Ritchie response email relating to limiting documents and Email to E. Weinstein and B. Marcello regarding rescheduling deposition dates	2.20
4/04/22	PKZ	Prepare for call with J. Gutkoski regarding status of discovery; Document review; Call with J. Gutkoski regarding status of discovery; Emails to/from target litigation regarding updated searches; Email to E. Weinstein regarding deposition; Email to B. Marcello regarding deposition and Email to J. Gutkoski and S. Magee regarding	4.15
4/05/22	PKZ	Document review; Emails from/to J. Gutkoski regarding producing documents in response to defendants' request for documents and Email to target litigation with	4.65
4/06/22	PKZ	Emails from/to E. Weinstein regarding scheduling deposition; Calls with target litigation regarding; Draft email to G. Ritchie regarding updated document numbers and deposition scheduling; Document review; Emails to/from M. Smith regarding scheduling deposition; Draft and edit Notice of Deposition for W. Brown; Emails from/to J. Gutkoski regarding deposition notices and draft email to G. Ritchie; Emails from/to client regarding	5.70
		Email to G. Ritchie regarding deposition scheduling and service of I. Lucas and W. Brown Notices of Deposition and D. Evans subpoena package	
4/07/22	PKZ	Email from/to J. Gutkoski regarding B. Davies deposition; Emails from/to G. Ritchie regarding B. Davies deposition; Document review; Meeting with E. Olson and J. Gutkoski regarding ; Calls with target litigation regarding ; Emails from/to J. Gutkoski regarding B.	5.40
		Davies deposition updated date and Review agreements and emails from/to J. Gutkoski regarding agreements	

Invoice #: 261338 May 6, 2022

Date	Atty	Description	Hours
4/08/22	PKZ	Email from/to J. Gutkoski regarding response to G. Ritchie email about deposition scheduling; Emails from/to target litigation regarding Document review; Emails from/to target litigation and clients regarding production of documents to defense counsel; Email to J. Gutkoski regarding scheduling depositions and document production email; Email to E. Weinstein confirming deposition date and scheduling preparation meeting; Emails to/from B. Marcello confirming deposition date and preparation meeting; Emails to M. Smith confirming deposition date and scheduling deposition preparation meeting; Update deposition calendar and email invitations to C. McIntire and B. Davies for preparation meetings; Emails to/from J. Gutkoski regarding subpoena question and Review B. Marcello and C. McIntire subpoenas and M. Smith notice of deposition	5.75
4/10/22	PKZ	Document review	.90
4/11/22	PKZ	Document review; Emails from/to E. Weinstein regarding deposition preparation; Emails from/to target litigation regarding; Emails from/to J. Gutkoski regarding 30(b)(6) deposition notices and status of document review; Email to M. Boom Edit 30(b)(6) deposition notices for ITG and Blue Sun	3.40
4/12/22	SRM	Attention to deposition and other discovery status; review numerous emails regarding same.	.50
4/12/22	PKZ	Finalize and dispatch KPM 30(b)(6) objection letter; Emails to/from client regarding objection letter and 30(b)(6) deposition topics; Email to client regarding scheduling deposition preparation meeting and depositions; Document review; Email from M. Boom regarding ; Email to J. Gutkoski regarding M. Boom Edit 30(b)(6) deposition notices to entity defendants and Finalize and dispatch	3.65
		30(b)(6) notices of deposition for the entity defendants	
4/13/22	PKZ	Email from/to J. Gutkoski regarding M. Smith deposition preparation and deposition scheduling; Email from defense counsel regarding defendants' damages expert signed exhibit A to protective order; Document review for M. Smith deposition preparation; Prepare for and conduct deposition preparation meeting with M. Smith; Email to M. Smith regarding follow up from deposition preparation meeting; Email to J. Gutkoski regarding M. Smith deposition preparation meeting	6.55
4/14/22	SRM	Telephone conference with P. Zacharakis regarding status of depositions.	.30

Invoice #: 261338 May 6, 2022

Date	Atty	Description	Hours
4/14/22	PKZ	Document review to prepare for C. McIntire deposition; Emails from/to J. Gutkoski regarding Blue Sun and ITG deposition scheduling; Emails from/to G. Ritchie regarding scheduling Blue Sun and ITG deposition; Call with E. Weinstein regarding deposition; Defend M. Smith deposition; Attend deposition preparation meeting with C. McIntire and email to G. Ritchie confirming start time for C. McIntire deposition	6.70
4/15/22	PKZ	Document review for B. Marcello deposition; Conduct B. Marcello deposition preparation meeting; Document review; Call with J. Gutkoski regarding C. McIntire deposition and B. Marcello deposition preparation meeting; Emails from/to G. Ritchie regarding canceling B. Marcello deposition; Call to J. Gutkoski regarding canceled B. Marcello deposition; Call to B. Marcello regarding canceled deposition; Email to target litigation Emails from/to Stoneturn and target litigation regarding and emails from/to J. Gutkoski regarding document review status	4.60
4/18/22	PKZ	Email from G. Ritchie regarding deposition scheduling and emails to/from J. Gutkoski regarding response to G. Ritchie; Email to B. Mitchell regarding rescheduling preparation meeting; Document review; Email to target litigation; Email to client regarding and Email to G. Ritchie confirming ITG deposition date and requesting meet and confer relating to 30(b)(6) KPM deposition notice	3.90
4/19/22	PKZ	Email from/to J. Gutkoski regarding ITG 30(b)(6) deposition; Emails to/from G. Ritchie regarding meet and confer and ITG 30(b)(6) deposition; preparation for deposition preparation meeting; Calls to target litigation regarding the graph of	5.20
4/20/22	SRM	Conference with P. Zacharakis regarding status of depositions; review discovery/production and deposition-related emails.	.80
4/20/22	PKZ	Emails from G. Ritchie and emails from/to J. Gutkoski regarding supplementing answers to interrogatories; Attend meet and confer conference with G. Ritchie; Emails from/to and call to target litigation regarding Search Supplemental production of documents; Emails from/to target litigation regarding Email from/to A. Allen regarding notice of deposition for E. Weinstein, B. Davies, B. Mitchell, and R. Geis; Emails to/from B. Davies regarding deposition invitation and copies of subpoena and notice of deposition; Emails to/from E. Weinstein regarding copies of subpoena and notice of deposition and deposition access for Friday; Dispatch supplemental production of documents; Email to client with	

Invoice #: 261338 May 6, 2022

Date	Atty	Description	Hours
4/21/22	PKZ	Emails from/to client regarding ; Messages from/to J. Gutkoski regarding B. Davies deposition and E. Weinstein preparation meeting; Deposition preparation meeting with E. Weinstein; Veritext meeting regarding deposition scheduling; Emails to/from target litigation regarding and Email to client	3.25
4/22/22	PKZ	Emails from/to J. Gutkoski regarding documents collection for E. Olson and B. Mitchell deposition preparation; Prepare for and defend E. Weinstein deposition; Email summary of E. Weinstein deposition to J. Gutkoski and items to follow up with; Document review and Call with J. Gutkoski regarding E. Weinstein deposition and remaining tasks for this week	5.55
4/23/22	PKZ	Email to B. Mitchell regarding deposition preparation meeting; Document review; Compile and prepare potential deposition exhibits for Blue Sun/I/ Lucas deposition	6.30
4/25/22	PKZ	Email to L. Lake regarding Deposition preparation meeting with E. Olson and B. Mitchell; Update internal deposition calendar and emails from/to J. Gutkoski; Create deposition exhibits ; Emails from/to J. Gutkoski regarding exhibits; Emails from/to M. Boom regarding ; Emails from/to Veritext regarding scheduling blue sun 30(b)(6) deposition; Review from Stoneturn, compile proposed documents and email to J. Gutkoski; Edit deposition notices to ITG and W. Brown and edit subpoena for D. Evans; Dispatch D. Evans subpoena and ITG and W. Brown Notices of Deposition and Emails from/to client	8.10
4/26/22	SRM	Emails with P. Zacharakis regarding R. Geis deposition and discovery status.	.50
4/26/22	PKZ	Emails from/to target litigation regarding and call from E. Olson; Emails from/to client and Veritext and call with client regarding; Emails from/to J. Gutkoski with requested pleadings; Schedule W. Brown deposition; Call with J. Gutkoski regarding E. Olson deposition and Blue Sun deposition; Deposition exhibit preparation for W. Brown and Dispatch deposition exhibits for W. Brown deposition to J. Gutkoski	2.50
4/27/22	PKZ	Emails from/to J. Gutkoski regarding documents; Email to/from K. Pickering regarding ; Prepare and attend I. Lucas/Blue Sun deposition; Call with J. Gutkoski regarding Blue Sun/I. Lucas deposition; D. Evans document review; Email to opposing counsel regarding R. Geis representation and Emails from/to E. Olson regarding	8.40

Invoice #: 261338	May 6, 2022
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Date	Atty	Description	Hours
4/28/22	PKZ	Emails from/to J. Gutkoski regarding ; Calls with target litigation regarding ; Emails to/from R. Geis regarding deposition preparation meeting; Attend W. Brown deposition; Emails from/to client regarding customer contracts; Email to defense counsel regarding representation of R. Geis; Dispatch M. Smith deposition transcript to J. Gutkoski and M. Smith; ITG deposition exhibit preparation; Emails from/to target litigation regarding ; Emails to M. Boom regarding	
4/29/22	PKZ	Emails from/to Veritext regarding scheduling D. Evans and ITG depositions; Research on documents and email to target litigation; Search for and email to client; Document review for and Emails from/to target litigation regarding	2.75
EXPENS	ES	TOTAL PROFESSIONAL SERVICES	\$ 40,997.25
EXPENS:		TOTAL PROFESSIONAL SERVICES	\$ 40,997.25
	Descr		
Date	Descr Targe	ription	Amount 5,712.58
Date 4/11/22	Descr Targe	ription t Litigation Consulting, Inc, Online research, 4/11/2022, 22897	Amount

Invoice #: 261338 May 6, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
258917	3/07/22	17,231.78	.00	17,231.78
260176	4/11/22	38,019.10	.00	38,019.10

Previous Balance \$55,250.88

Total Due This Invoice \$48,059.23

TOTAL BALANCE DUE \$ 103,310.11

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 192 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

May 6, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

Invoice #: 261338 Client #: 10255 Matter #: 36384 Billing Attorney: **JCM**

REMITTANCE ADVICE

RE: KPM Analytics-NIR Senry

BALANCE DUE THIS INVOICE \$ 48,059.23

Previous Balance \$ 55,250.88

TOTAL BALANCE DUE **\$ 103,310.11**

Make checks payable to: Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website www.morse.law and click

"payments" at the bottom of the page.

Wire Instructions:

For domestic wire payments: Cambridge Trust

Cambridge Trust

For international wire payments:

(USD denominated)

INVOICE IS PAYABLE UPON RECEIPT



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

June 8, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through May 31, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 194 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

June 8, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 262395 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through May 31, 2022:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	27,866.75	11,095.48	38,962.23
Total		28,902.75	11,095.48	39,998.23

TOTAL THIS INVOICE \$39,998.23

Previous Balance \$86,078.33

TOTAL BALANCE DUE \$ 126,076.56

Invoice #: 262395 June 8, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
5/02/22	PKZ	Emails from/to J. Gutkoski regarding close of discovery; Email to Stoneturn; Emails from/to target litigation regarding; Document review for final production; Emails from/to client regarding; Call with E. Olson regarding and Dispatch final production of documents to defense counsel	1.65
5/03/22	PKZ	Emails from/to client regarding ; Emails from/to J. Gutkoski regarding R. Wilt deposition and Veritext; Attend R. Wilt deposition; Call with J. Gutkoski regarding R. Wilt deposition; Emails from/to target litigation regarding ; Review documents tagged for R. Geis preparation meeting; Deposition document preparation for D. Evans deposition and Email to J. Gutkoski and S. Magee with D. Evans proposed deposition exhibit list	5.50
5/04/22	SRM	Emails with P. Zacharakis and J. Tumilty regarding responses to interrogatories requiring reference to AEO documents; review and analyze information from P. Zacharakis regarding remaining deposition exhibits and deposition issues.	1.80
5/04/22	PKZ	Finish compiling proposed deposition exhibits for D. Evans and email to J. Gutkoski; Email to Stoneturn Attend R. Geis deposition preparation meeting; Email to Veritext regarding Messages from/to J. Gutkoski regarding documents and emails to S. Magee and J. Tumilty regarding supplementing contention interrogatory answers	2.55
5/05/22	SRM	Attention to letter response; emails with J. Marrow regarding same; conference with P. Zacharakis regarding summary of discovery and plans for next steps in expert discovery.	.90
5/05/22	PKZ	Email to S. Magee and J. Gutkoski regarding supplementing contention interrogatory answer; Attend D. Evans deposition and call with J. Gutkoski regarding D. Evans deposition and supplementing answers to interrogatories	3.25
5/06/22	PKZ	Email to Stoneturn with D. Evans rough transcript; Messages from/to J. Gutkoski regarding documents; Search for and email to J. Gutkoski regarding documents on database and Email to client regarding	.60

Invoice #: 262395 June 8, 2022

Date	Atty	Description	Hours
5/09/22	SRM	Attend status conference; telephone conference with J. Gutkoski and P. Zacharakis regarding strategy for next steps ; draft insert to letter response regarding Blue Sun litigation and emails with J. Marrow regarding same.	2.50
5/09/22	PKZ	Attend status conference and call with S. Magee and J. Gutkoski regarding supplementing answers to interrogatories; Emails from/to J. Gutkoski and S. Magee regarding part steps; Emails from/to client regarding; Email to target litigation regarding and email to J. Gutkoski regarding	.75
5/10/22	PKZ	Emails from/to J. Gutkoski, S. Magee, and M. Boom regarding meeting to discuss	.10
5/11/22	SRM	Attention to documents for supplemental production of documents and emails with J. Gutkoski and P. Zacharakis regarding same; emails with J. Gutkoski regarding planning for supplementation of discovery responses.	1.20
5/11/22	PKZ	Emails from/to S. Magee and J. Gutkoski regarding and review and further annotate answers to interrogatories in preparation for supplementation	.50
5/12/22	SRM	Emails with J. Gutkoski and P. Zacharakis regarding next steps on supplementing interrogatories and supplemental production of document issues.	.60
5/12/22	PKZ	Emails from/to J. Gutkoski and S. Magee regarding supplementing answers to interrogatories and	.20
5/13/22	PKZ	Meeting with Stoneturn regarding Emails to/from Veritext regarding deposition transcripts and invoices; Emails from/to J. Gutkoski regarding supplemental answers to interrogatories and for Stoneturn and Email to Stoneturn with	1.25
5/14/22	PKZ	Email to Stoneturn with Summarize tasks for supplemental answers to interrogatories and email to J. Gutkoski and S. Magee	1.50
5/16/22	SRM	Outline remaining issues to address in answers to interrogatories; emails with J. Gutkoski and P. Zacharakis regarding same; begin working on supplemental answer to interrogatory	1.10
5/16/22	PKZ	Emails from/to J. Gutkoski and S. Magee regarding supplemental answers to interrogatories; Email to Stoneturn with ; Email from Veritext with R. Geis deposition transcript; Supplement answers to interrogatories and Email to C. Parker regarding	4.00
5/17/22	SRM	Analyze documents from P. Zacharakis for use in supplemental responses to interrogatories; attention to AEO designations for supplemental responses.	2.00

Invoice #: 262395 June 8, 2022

Date	Atty	Description	Hours
5/17/22	PKZ	Email to J. Gutkoski regarding Veritext bill for Blue Sun deposition; Emails from/to target litigation regarding Supplement answers to interrogatories and Emails from/to S. Magee and J. Gutkoski regarding supplemental answers to interrogatories	3.10
5/18/22	SRM	Review and comment on expert report draft; draft supplemental answer to interrogatories; review P. Zacharakis updates to supplemental responses to interrogatories; identify documents for reference in supplemental responses to interrogatories; telephone conference with J. Gutkoski and P. Zacharakis regarding supplemental responses to interrogatories.	5.70
5/18/22	PKZ	Call with S. Magee regarding supplemental answers to interrogatories; Email to Stoneturn regarding ; Emails from/to Veritext and billing regarding ACE charges; Emails from/to J. Gutkoski and S. Magee regarding supplemental answers to interrogatories; Document review; Call with S. Magee and J. Gutkoski regarding supplemental answers to interrogatories and Review S. Magee notes on supplemental answers to interrogatories	2.80
5/20/22	SRM	Review and analyze current status of draft expert report.	1.90
5/21/22	SRM	Work on identifying additional record citations for expert report.	1.00
5/22/22	SRM	Continued work on supplemental answers to interrogatories; work on additional information concerning customer confusion for expert report.	4.00
5/23/22	SRM	Videoconference with client and expert regarding work on comments to draft expert report; telephone conferences with J. Gutkoski regarding same.	5.50
5/23/22	PKZ	Emails from/to M. Boom regarding Emails from/to J. Gutkoski and S. Magee regarding client meeting; Expert and client meeting with S. Magee; Emails from/to S. Magee regarding documents; Emails from/to Stoneturn and clients regarding Emails from/to Stoneturn regarding Review draft expert report and email comments; Emails from/to Stoneturn regarding final comments and citations to expert report; Emails from/to S. Magee regarding service of expert report; Email to Stoneturn, S. Magee and J. Gutkoski regarding and Review and dispatch expert report to opposing counsel	3.60
5/24/22	SRM	Attention to redaction issues for expert report; emails from P. Zacharakis regarding same.	.30
5/24/22	PKZ	Emails from.to J. Gutkoski and S. Magee regarding redacting expert report and to send to client	1.40

Invoice #: 262395 June 8, 2022

Date	Atty	Description	Hours
5/25/22	PKZ	Emails from/to J. Gutkoski and S. Magee regarding redacted expert report; Email to J. Gutkoski and S. Magee regarding ; Email to E. Olson regarding ; Email to E. Weinstein regarding ; Redact additional information from expert report; Email to E. Olson about	1.00
5/26/22	SRM	Emails with P. Zacharakis and J. Gutkoski regarding deposition errata sheets and expert report.	.20
5/26/22	PKZ	Email to J. Gutkoski and S. Magee regarding M. Smith errata sheet and Email to opposing counsel regarding M. Smith errata sheet	.40
5/27/22	PKZ	Email to opposing counsel with signed protective orders from C. Ross and Y. Zhao; Emails from/to E. Olson regarding ; Check if are in previous production; Emails from/to target litigation regarding and Email to	.60
5/31/22	PKZ	Review ; Email to target litigation regarding production of documents today; Emails from/to J. Gutkoski and S. Magee regarding ; Edit supplemental answers to interrogatories; Review remaining documents in database for final production and dispatch supplemental production of documents to opposing counsel	.90

TOTAL PROFESSIONAL SERVICES

\$ 27,866.75

EXPENSES

Date	Description	Amount
4/28/22	Veritext LLC, Litigation Support Vendors, 4/28/2022, 5746927	-1,349.40
4/28/22	Veritext LLC, Litigation Support Vendors, 4/28/2022, 5746927	1,298.90
4/29/22	Veritext LLC, Litigation Support Vendors, 4/29/2022, 5747055	658.48
5/09/22	Veritext LLC, Litigation Support Vendors, 5/9/2022, 5756206	775.70
5/10/22	Veritext LLC, Litigation Support Vendors, 5/10/2022, 5767897	1,968.75
5/12/22	Veritext LLC, Litigation Support Vendors, 5/12/2022, 5767724	684.40
5/12/22	Veritext LLC, Litigation Support Vendors, 5/12/2022, 5776455	1,506.80
5/17/22	Veritext LLC, 5/17/2020, Litigation Support Vendors, 5786225	3,113.20
5/19/22	Veritext LLC, Litigation Support Vendors, 5/19/2022, 5784108	2,438.65

TOTAL EXPENSES

\$ 11,095.48

MATTER TOTAL

\$ 38,962.23

Invoice #: 262395 June 8, 2022



Invoice #: 262395 June 8, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
260176	4/11/22	38,019.10	.00	38,019.10
261338	5/06/22	48,059.23	.00	48,059.23

Previous Balance \$86,078.33

Total Due This Invoice \$39,998.23

TOTAL BALANCE DUE <u>\$126,076.56</u>

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 203 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

June 8, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 262395 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$39,998.23

Previous Balance \$86,078.33

TOTAL BALANCE DUE \$ 126,076.56

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

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July 6, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through June 30, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 205 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

July 6, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 263493 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through June 30, 2022:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	5,031.50	166.61	5,198.11
Total		6,136.50	166.61	6,303.11

TOTAL THIS INVOICE \$ 6,303.11

Previous Balance \$88,057.46

TOTAL BALANCE DUE \$94,360.57

Invoice #: 263493 July 6, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
6/01/22	PKZ	Edit supplemental answers to interrogatories; Email to S. Magee and J. Gutkoski with latest version of supplemental answers to interrogatories and Blue Sun document review	3.00
6/02/22	PKZ	Emails from/to M. Smith ; Blue Sun document review; Emails from/to J. Gutkoski regarding documents; Email to J. Gutkoski and S. Magee regarding M. Smith Errata Sheet and email opposing counsel M. Smith errata sheet	1.00
6/03/22	PKZ	Review emails between G. Ritchie and J. Gutkoski, and J. Gutkoski and Stoneturn regarding; Emails from/to J. Gutkoski regarding scheduling meet and confer with G. Ritchie; Add additional bates numbers to supplemental answers to interrogatories and Blue Sun document review	1.50
6/07/22	PKZ	Prepare for meeting with G. Ritchie and J. Gutkoski regarding damages testimony issue; Conference call with G. Ritchie and J. Gutkoski regarding damages testimony issue; Call with J. Gutkoski regarding follow up of G. Ritchie call; Edit supplemental answers to interrogatories; Emails to/from client regarding and dispatch supplemental answers to interrogatories	2.00
6/08/22	PKZ	Email from J. Gutkoski regarding recap of meet and confer with G. Ritchie; Email from J. Gutkoski to G. Ritchie with our position and email to S. Magee with response	.20
6/13/22	PKZ	Email to client regarding ; Email from J. Gutkoski regarding filing Motion to Compel under seal	.10
6/14/22	PKZ	Email to client regarding ; create Errata Sheet; call with client regarding and email to client with	.60
6/15/22	PKZ	Emails from/to client regarding and review and dispatch E. Olson errata sheet to opposing counsel	.10
6/21/22	SRM	Review recusal order and new judge assignment; research regarding	1.00
6/28/22	SRM	Assemble key documents and deposition exhibits for expert witness; emails with expert regarding same; review motion to compel in preparation for call with J. Gutkoski.	1.80
6/29/22	SRM	Telephone conference with J. Gutkoski regarding motion to compel; work on material to send to E. Olson.	1.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 207 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

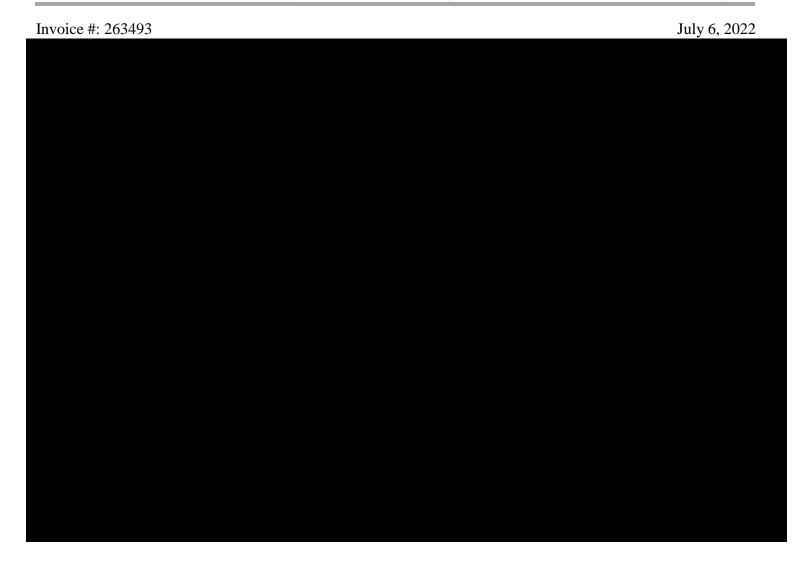
Invoice #: 263493 July 6, 2022

TOTAL PROFESSIONAL SERVICES

\$ 5,031.50

EXPENSES

Date	Description	Amount
6/01/22	Thomson Reuters - West, Online research, 6/1/2022, 846503011	166.61
	TOTAL EXPENSES	\$ 166.61
	MATTER TOTAL	\$ 5,198.11



Invoice #: 263493 July 6, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
261338	5/06/22	48,059.23	.00	48,059.23
262395	6/08/22	39,998.23	.00	39,998.23

TOTAL BALANCE DUE

Previous Balance \$88,057.46

Total Due This Invoice \$6,303.11

\$ 94,360.57

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 210 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

July 6, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 263493 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 6,303.11

Previous Balance \$88,057.46

TOTAL BALANCE DUE \$94,360.57

Make checks payable to:

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Waltham, MA 02451

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Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 211 of 418



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August 9, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through July 31, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 212 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

August 9, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 264601 Client #: 10255 Billing Attorney: JCM

\$ 23,068.00

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through July 31, 2022:

TOTAL THIS INVOICE

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	18,030.50	.00	18,030.50
Total		23,068.00	.00	23,068.00

Less Trust Applied	\$ -5,712.58
BALANCE DUE THIS INVOICE	\$ 17,355.42
Previous Balance	\$ 6,303.11
TOTAL BALANCE DUE	<u>\$ 23,658.53</u>

Invoice #: 264601 August 9, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

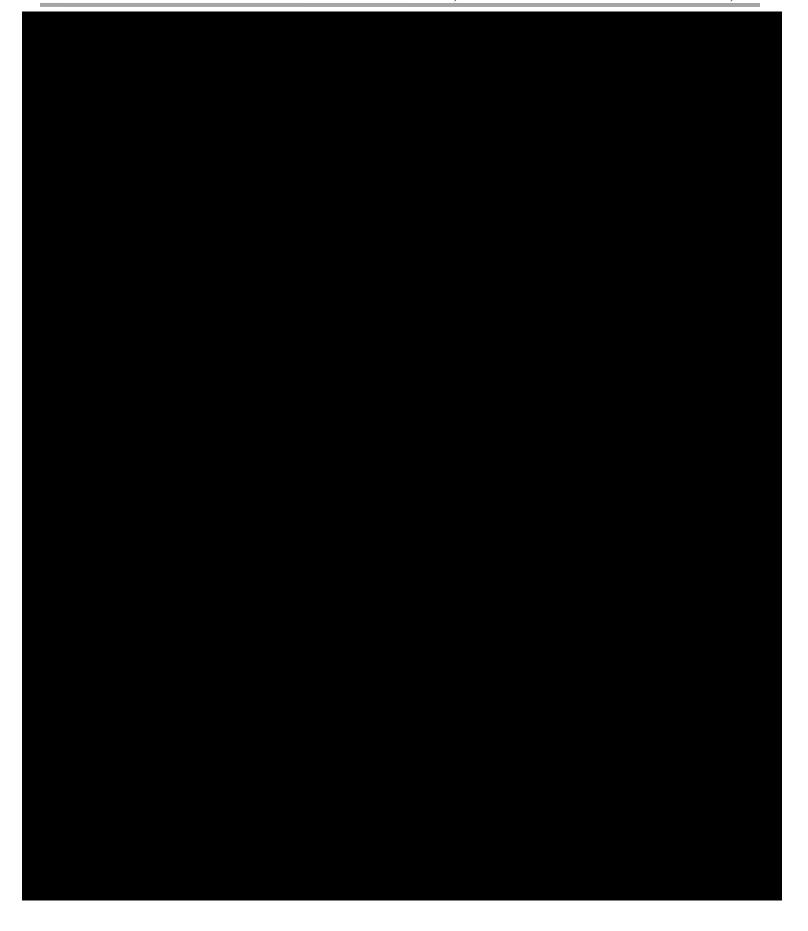
Date	Atty	Description	Hours		
7/06/22	SRM	Research regarding various issues requested by J. Gutkoski for opposition to motion to compel; summarize key research and email same to J. Gutkoski.			
7/07/22	SRM	Draft and file motion to seal for opposition to motion to compel; emails with opposing counsel regarding same; work on factual record citations for opposition to motion to compel; emails with J. Gutkoski regarding same.			
7/08/22	SRM	Edit opposition to motion to compel; work on exhibits for motion to compel; contact clerk regarding motion to seal; review orders regarding sealing and redaction; emails with J. Gutkoski regarding opposition; redact brief; emails with clerk regarding same; finalize and serve redacted and unredacted versions of opposition to motion to compel.			
7/11/22	SRM	Work with clerk regarding supplemental filing or unredacted copies of opposition to motion to compel; prepare filings accordingly.			
7/11/22	PKZ	Emails from/to S. Magee regarding AA Dority bond renewal and email to client; emails from/to J. Gutkoski regarding supplemental production of documents and email to target litigation regarding ; review and organize for motion to compel			
7/12/22	PKZ	Review and annotate motion to compel and opposition; email to S. Magee and J. Gutkoski regarding motion to compel, opposition, and outstanding matters in the case; document review of production; emails from/to target litigation regarding	.70		
7/13/22	SRM	Attention to emails concerning supplemental document production; attention to production.	.60		
7/13/22	PKZ	Dispatch supplemental production of documents	.10		
7/14/22	PKZ	Emails from/to D. Rooney (individual defendants' counsel) regarding supplemental productions of documents			
7/26/22	SRM	Initial review of expert report from defendants' expert witness.	1.20		
7/26/22	PKZ	Email from/to J. Gutkoski regarding scheduling meeting regarding expert depositions and defendants' expert report; Review and effendants' expert report and compare to Plaintiff's expert report			
7/27/22	SRM	Review, analyze and comment on defendants' expert report and related exhibits.	4.40		

Invoice #: 264601 August 9, 2022

Date	Atty	Description	Hours	
7/27/22	PKZ	Review and compile documents considered by Defendants' expert and for J. Gutkoski, S. Magee, and Stoneturn; Review and ; and review email from S. Magee with thoughts on Defendants' Expert Report in preparation for Stoneturn meeting tomorrow	2.50	
7/28/22	SRM	Review court order denying Blue Sun's motion to compel; attention to emails regarding same and regarding expert depositions.	.50	
7/28/22	PKZ	Review decision on Motion to Compel; attend meeting with Stoneturn regarding		
7/29/22	SRM	Research updated information concerning I. Lucas indictment and ; emails with J. Gutkoski and P. Zacharakis regarding same; review and identify key cases regarding damages; emails with P. Zacharakis and H. Chen regarding same.	2.80	
7/29/22	PKZ	Email to law clerk and S. Magee regarding research points in response to defendants' expert report; Emails from/to S. Magee and J. Gutkoski regarding defendants' expert taking a leave of absence and update on I. Lucas' sentencing	.25	

TOTAL PROFESSIONAL SERVICES \$ 18,030.50

MATTER TOTAL \$ 18,030.50



Invoice #: 264601 August 9, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
263493	7/06/22	6,303.11	.00	6,303.11

Previous Balance \$ 6,303.11

Total Due This Invoice \$17,355.42

TOTAL BALANCE DUE \$23,658.53

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 217 of 418



CityPoint
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Waltham, MA 02451
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t -781-622-5930
f -781-622-5933
billing@morse.law

August 9, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 264601 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 17,355.42

Previous Balance \$6,303.11

TOTAL BALANCE DUE \$23,658.53

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Waltham, MA 02451

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Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 218 of 418



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September 14, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through August 31, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 219 of 418



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September 14, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 266090 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through August 31, 2022:

Matter#	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	20,720.50	1,415.25	22,135.75
Total		21,446.75	1,436.36	22,883.11

TOTAL THIS INVOICE \$ 22,883.11

Previous Balance \$ 17,355.42

TOTAL BALANCE DUE \$ 40,238.53



Invoice #: 266090 September 14, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
8/01/22	SRM	Attention to expert deposition preparation and damages analysis; emails regarding expert deposition preparation.	1.50
8/01/22	PKZ	Legal research into damages	.70
8/02/22	SRM	Review deposition notice for expert and analyze rules concerning production of materials for deposition; emails with J. Gutkoski and P. Zacharakis regarding same.	.60
8/02/22	PKZ	Legal research into damages in preparation for expert deposition and email short answer to S. Magee; Review and file Notice of Deposition to Stoneturn; Emails from/to L. Lake regarding scheduling Stoneturn deposition; Research local rules and updated civil rules on privileged communications with experts	2.30
8/03/22	SRM	Review updated I. Lucas criminal docket; email to B. Mitchell regarding update and key documents concerning same.	.80
8/04/22	SRM	Preparation session with N. Zoltkowski for deposition (with J. Gutkoski and P. Zacharakis); prepare for same.	2.80
8/04/22	PKZ	Deposition preparation meeting with Stoneturn, J. Gutkoski, and S. Magee	1.80
8/05/22	SRM	Emails with J. Gutkoski regarding deposition of expert and production of additional information for deposition.	.20
8/10/22	PKZ	Emails from/to client regarding	.10
8/12/22	SRM	Initial review and analysis of N. Zoltkowski deposition transcript.	2.50
8/15/22	PKZ	Review and create for N. Zoltowski	.90
8/17/22	SRM	Emails regarding potential ITG motion to seal and motion for summary judgment.	.20
8/17/22	PKZ	Emails from J. Gutkoski and G. Ritchie regarding Defendants' Summary Judgment Motion and meet and confer	.10
8/18/22	SRM	Rule 7.1 meet and confer conference call with G. Ritchie regarding ITGC motion for summary judgment; emails with J. Gutkoski and P. Zacharakis regarding evidence against ITGC; begin analysis regarding evidence for on ITGC.	1.50

Invoice #: 266090 September 14, 2022

Date	Atty	Description	Hours
8/18/22	PKZ	Review ITG's motion to seal motion for summary judgment and proposed order; Prepare for and attend meet and confer meeting regarding ITG's motion for summary judgment, Emails from/to J. Gutkoski and S. Magee regarding possible evidence to oppose ITG motion for summary judgment, Continue to review damages expert deposition	1.50
8/19/22	SRM	Initial review of ITGC motion for summary judgment.	.80
8/19/22	PKZ	Finish review of damages expert deposition	.75
8/22/22	SRM	Detailed analysis of ITGC motion for summary judgment and attachments; prepare for call with P. Zacharakis and J. Gutkoski regarding planning for opposition.	2.00
8/22/22	PKZ	Emails from/to J. Gutkoski and S. Magee; Email client public version of ITG's Motion for Summary Judgment; Review and annotate ITG's Memorandum in support of Motion for Summary Judgment; Research for opposition to Motion for Summary Judgment; Prepare outline for opposition to Motion for Summary Judgment and Blue Sun document review	5.20
8/23/22	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding ITGC motion for summary judgment; begin work on counterarguments regarding veil piercing; emails with P. Zacharakis regarding same; emails regarding defendants' intent to file a motion to dissolve preliminary injunction.	2.30
8/23/22	PKZ	Review Joint Motion to file Motion to Dissolve Preliminary Injunction under Seal; Meeting with J. Gutkoski and S. Magee regarding ITG's opposition to motion for summary judgment; Blue Sun document review; and emails from/to J. Gutkoski and S. Magee regarding defendants' motion to dissolve preliminary injunction	2.40
8/24/22	SRM	Review and analyze defendants' motion to dissolve injunction with attachments; emails with J. Marrow regarding motion to dissolve injunction and motion for summary judgment.	1.30
8/24/22	PKZ	Blue Sun document review; Research for opposition to motion for summary judgment and review defendants' motion to dissolve or modify preliminary injunction	2.90
8/25/22	PKZ	Finish reviewing and annotating defendants' memo in support of motion to dissolve or modify the preliminary injunction order; Finish Blue Sun document review; Search documents to support opposition to ITG motion for summary judgment and opposition to motion to dissolve preliminary injunction	3.50
8/26/22	SRM	Emails with J. Gutkoski and P. Zacharakis regarding motion to dissolve injunction; prepare for call with J. Gutkoski and P. Zacharakis regarding same.	1.10

Invoice #: 266090 September 14, 2022

Date	Atty	Description	Hours
8/26/22	PKZ	Search documents for instances of customer confusion; Review documents for exhibits in support of opposition to ITG motion for summary judgment and opposition to motion to dissolve preliminary injunction and with S. Magee and J. Gutkoski of documents to support opposition to motion for summary judgment and motion to dissolve preliminary injunction	5.60
8/29/22	SRM	Telephone conference with J. Gutkoski and P. Zacharakis regarding planning for opposition to motion to dissolve injunction; attention to opposition.	.70
8/29/22	PKZ	Prepare for and attend meeting with J. Gutkoski and S. Magee regarding opposition to motion to dissolve preliminary injunction	.30
8/30/22	PKZ	Legal research for opposition to motion for summary judgment	1.75
8/31/22	SRM	Emails regarding extension of time to file opposition to motion to dissolve injunction and expert depositions; review draft motion to extend time to file opposition; confirm local rules regarding timing of extension.	.50
8/31/22	PKZ	Emails from/to J. Gutkoski and S. Magee regarding drafting joint stipulation to extend opposition deadline for motion to dissolve preliminary injunction; emails from opposing counsel regarding extending deadlines for oppositions; emails from/to J. Gutkoski and S. Magee regarding scheduling defendants' damages expert; draft joint stipulation to extend deadlines for oppositions and email to J. Gutkoski and S. Magee	.50

Date	Description	Amount
8/11/22	Veritext LLC, Litigation Support Vendors, 8/11/2022, 5966972	1,415.25

TOTAL EXPENSES \$ 1,415.25 **MATTER TOTAL** \$ 22,135.75



\$ 40,238.53

Invoice #: 266090 September 14, 2022

OUTSTANDING INVOICES

-	INVOICE	DATE	INVOICE	PA YM ENTS	ENDING
	NUMBER		TOTAL	RECEIVED	BALANCE
	264601	8/09/22	23,068.00	5,712.58	17,355.42
		Previ	ous Balance		\$ 17,355.42
		Total	Due This Invoice		\$ 22,883.11

TOTAL BALANCE DUE

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 226 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

September 14, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 266090 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 22,883.11

Previous Balance \$ 17,355.42

TOTAL BALANCE DUE \$40,238.53

Make checks payable to: Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website **www.morse.law** and click

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INVOICE IS PAYABLE UPON RECEIPT



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

October 13, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through September 30, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 228 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

October 13, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 266949 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through September 30, 2022:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	29,829.50	5,350.85	35,180.35
Total		29,962.50	5,350.85	35,313.35

TOTAL THIS INVOICE \$ 35,313.35

Previous Balance \$ 22,883.11

TOTAL BALANCE DUE \$58,196.46

Invoice #: 266949 October 13, 2022

Invoice #: 266949 October 13, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
9/01/22	SRM	Attention to motion to extend time to respond to motion to dissolve preliminary injunction.	.20
9/01/22	PKZ	Edit assented-to motion to extend the deadline to file opposition to motion to dissolve preliminary injunction and email to J. Gutkoski and S. Magee; Finalize and file motion to extend deadline to file opposition to motion to dissolve preliminary injunction	
9/07/22	SRM	Work on opposition to motion for summary judgment; review and analyze key exhibits and deposition transcripts regarding same.	2.00
9/07/22	PKZ	Emails from/to client regarding, and Legal research for opposition to motion for summary judgment	2.00
9/08/22	SRM	Conference with P. Zacharakis regarding Blue Sun/ITG summary judgment; review and analyze additional documents for use in summary judgment arguments.	1.20
9/09/22	SRM	Analyze Wilt and Blue Sun depositions for opposition to summary judgment; emails with P. Zacharakis regarding record for summary judgment opposition; emails with J. Gutkoski and P. Zacharakis regarding opposition to motion to dissolve preliminary injunction.	4.70
9/09/22	PKZ	Legal research for opposition to motion for summary judgment, draft opposition to motion for summary judgment, and email update to J. Gutkoski and S. Magee	5.00
9/12/22	SRM	Attention to summary judgment draft sections from P. Zacharakis; attention to summary judgment requirements of Judge Sorokin standing order; emails regarding same.	1.00
9/12/22	PKZ	Review opposition to dissolution of preliminary injunction outline and email to J. Gutkoski and S. Magee; review Sorokin, J. standing orders and local rules of opposition page limits; emails from/to J. Gutkoski and S. Magee regarding missing statement of facts and review outline of opposition to motion to dissolve preliminary injunction	2.20
9/13/22	PKZ	Insert supporting documentation notes into opposition to preliminary injunction outline and email to J. Gutkoski and S. Magee	1.30
9/14/22	SRM	Work on opposition to motion for summary judgment and related research and review of record for relevant citations; review draft motions to file under seal; emails with J. Gutkoski and P. Zacharakis regarding same.	4.10

Invoice #: 266949 October 13, 2022

Date	Atty	Description	Hours		
9/14/22	PKZ	Emails from/to S. Magee and J. Gutkoski regarding motion to file oppositions under seal and Emails from/to defense counsel requesting permission to file motion to file opposition under seal	.50		
9/15/22	SRM	ontinue drafting sections of opposition to motion for summary judgment; search, review and analyze case law regarding same.			
9/15/22	PKZ	Edit Motions to Seal (oppositions to motion for summary judgment and to dissolve preliminary injunction); Email draft Motions to file oppositions under seal to S. Magee and J. Gutkoski; File Motions to file oppositions under seal; Generate	2.60		
		; Legal research for opposition to motion to dissolve preliminary injunction and Emails from/to J. Gutkoski and S. Magee regarding Blue Sun's business			
9/16/22	SRM	Edit sections of opposition to ITG motion for summary judgment; research regarding same; analyze for record cites for opposition to motion to dissolve injunction.	4.00		
9/16/22	PKZ	Legal research for opposition to motion to dissolve preliminary injunction and finding supporting documents for the opposition to dissolve the preliminary injunction	4.90		
9/17/22	PKZ	Review E. Olson declarations and Email to J. Gutkoski and S. Magee with paragraph citation for opposition to motion to dissolve preliminary injunction motion	.50		
9/18/22	SRM	Work on opposition to motion for summary judgment; emails with P. Zacharakis regarding same.	3.80		
9/18/22	PKZ	Review deposition transcripts for testimony and email to J. Gutkoski and S. Magee; Edit opposition to motion for summary judgment and Draft S. Magee declaration in support of oppositions	3.00		
9/19/22	SRM	Edits to and finalization of opposition to motion for summary judgment and opposition to motion to dissolve injunction; numerous emails with J. Gutkoski and P. Zacharakis regarding same; attention to declaration in support of oppositions; final research regarding key elements of for inclusion in summary judgment opposition.	5.10		
9/19/22	PKZ	Emails from/to S. Magee and J. Gutkoski regarding oppositions to motion for summary judgment and motion to dissolve preliminary injunction; Legal research into federal summary judgment standard and addition willful blindness citations; Draft and edit Declaration of S. Magee; Prepare all exhibits for public filing and sealed filings; Redact opposition to motion for summary judgment; E-file Oppositions and related documents; Email sealed oppositions and related documents to clerk and Email opposing counsel sealed versions of the oppositions and exhibits	9.90		

Invoice #: 266949 October 13, 2022

Date	Atty	Description	Hours
9/20/22	PKZ	Draft and edit letter to clerk with oppositions, declaration and sealed documents and prepare and dispatch courtesy package to clerk of Oppositions and all related filings	1.00
9/21/22	SRM	Attention to defendants' request for client review of unredacted briefing; emails regarding same.	.80
9/21/22	PKZ	Emails from/to S. Magee and J. Gutkoski regarding D. Wilson response email and canceling dispositive motion hearing in Worcester	.20
9/22/22	PKZ	Review Oppositions for KPM AEO material and emails to/from J. Gutkoski and S. Magee with suggested redactions to defendants	.80
9/26/22	PKZ	Review ITG reply memo in response to opposition to motion for summary judgment and emails from/to S. Magee and J. Gutkoski regarding reply memo	.20
9/27/22	PKZ	Review reply memo in response to opposition to motion to modify or dissolve the preliminary injunction; Email comments on reply memo to J. Gutkoski and S. Magee; Review motion to modify or dissolve preliminary injunction and opposition and	1.30
9/28/22	PKZ	Review Motion to dissolve or modify the preliminary injunction to assess whether ; Email to J. Gutkoski regarding ; Emails from/to J. Gutkoski regarding response from D. Wilson and sending redacted versions to clients, and emails to damages expert with all filings relating to motion for summary judgment and motion to dissolve the preliminary injunction	.90
9/30/22	SRM	Review and analyze reply briefs and cases cited therein; emails with J. Gutkoski and P. Zacharakis regarding same.	.90

TOTAL PROFESSIONAL SERVICES

\$ 29,829.50

EXPENSES

Date	Description	Amount
5/17/22	Veritext LLC, Filing Fees, 5/17/2022, 5777214	1,405.26
5/19/22	Veritext LLC, Filing Fees, 5/19/2022, 5782561	1,424.39
5/20/22	Veritext LLC, Filing Fees, 5/20/2022, 5786023	2,043.20
8/01/22	Thomson Reuters - West, Online research, 8/1/2022, 846823546	478.00

TOTAL EXPENSES

\$ 5,350.85

MATTER TOTAL

\$ 35,180.35

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 233 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 266949 October 13, 2022

TOTAL THIS INVOICE

\$ 35,313.35

Invoice #: 266949 October 13, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
266090	9/14/22	22,883.11	.00	22,883.11

Previous Balance \$ 22,883.11

Total Due This Invoice \$ 35,313.35

TOTAL BALANCE DUE \$58,196.46

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 235 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

October 13, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 266949
Client #: 10255
Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 35,313.35

Previous Balance \$22,883.11

TOTAL BALANCE DUE \$58,196.46

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

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"payments" at the bottom of the page.

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For international wire payments: (USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT



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Waltham, MA 02451
morse.law
t -781-622-5930
f -781-622-5933
billing@morse.law

November 9, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through October 31, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 237 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

November 9, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 269237 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through October 31, 2022:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	3,791.00	846.36	4,637.36
Total		6,228.50	846.36	7,074.86

TOTAL THIS INVOICE \$ 7,074.86

Previous Balance \$35,313.35

TOTAL BALANCE DUE \$42,388.21

Invoice #: 269237 November 9, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
10/06/22	PKZ	Emails from/to J. Gutkoski regarding G. Ritchie email on damages expert deposition	.10
10/14/22	SRM	Attention to emails and deposition notice for expert deposition of defendants' expert.	.70
10/14/22	PKZ	Draft expert deposition notice, emails to/from S. Magee and J. Gutkoski regarding deposition notice, and finalize and dispatch deposition notice to opposing counsel	.40
10/17/22	PKZ	Emails from/to G. Ritchie and J. Gutkoski regarding scheduling expert deposition; Draft and edit re-notice of deposition for W. Kennedy; Dispatch re-notice of W. Kennedy; Schedule W. Kennedy deposition with Veritext and email to J. Gutkoski regarding preparation for W. Kennedy deposition	.40
10/24/22	SRM	Attention to emails regarding calibration reports.	.20
10/24/22	PKZ	Emails from/to client and J. Gutkoski regarding and emails to/from target litigation regarding	.50
10/26/22	PKZ	Document review of latest email communication with emails to/from target litigation regarding production, and emails to/from J. Gutkoski regarding production of documents	.30
10/27/22	SRM	Video conference with J. Gutkoski and P. Zacharakis regarding expert deposition, case status, expected case schedule; prepare for same; analyze M. Boom	1.50
10/27/22	PKZ	Meeting with S. Magee and J. Gutkoski regarding status of case and preparation for expert deposition of W. Kennedy; Email to opposing counsel in preparation for W. Kennedy deposition; Email to opposing counsel with supplemental production of documents and emails to J. Gutkoski in preparation for W. Kennedy deposition	1.20
10/31/22	SRM	Attention to materials produced with expert deposition/ITGC information.	.60
10/31/22	PKZ	Prepare exhibits for expert deposition; Attend expert deposition and review documents produced by W. Kennedy	3.30

TOTAL PROFESSIONAL SERVICES

\$ 3,791.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 239 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

Invoice #: 269237 November 9, 2022

EXPENSES

Date	Description	Amount
9/01/22	Thomson Reuters - West, Online research, 9/1/2022, 846998543	274.46
9/28/22	Mercury Shipping, Fedex/Mercury, 9/28/2022, 541523 - Samantha Dore	31.27
10/01/22	Thomson Reuters - West, Online research, 10/1/2022, 847159514	540.63
	TOTAL EXPENSES	\$ 846.36
	MATTER TOTAL	\$ 4,637.36

Invoice #: 269237 November 9, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
266949	10/13/22	35,313.35	.00	35,313.35

Previous Balance \$35,313.35

Total Due This Invoice \$7,074.86

TOTAL BALANCE DUE \$42,388.21

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 242 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

November 9, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 269237 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 7,074.86

Previous Balance \$35,313.35

TOTAL BALANCE DUE \$42,388.21

Make checks payable to:

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Waltham, MA 02451

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Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 243 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

December 20, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through November 30, 2022.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 244 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

December 20, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 269895 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through November 30, 2022:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	1,364.25	1,642.70	3,006.95
Total		3,841.00	1,642.70	5,483.70

TOTAL THIS INVOICE \$ 5,483.70

Previous Balance \$ 17,400.11

TOTAL BALANCE DUE \$22,883.81

Please be advised that effective January 1, 2023, we will be raising our hourly rates. Please do not hesitate to call us if you have any questions about our rates on your bill.

Invoice #: 269895 December 20, 2022

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
11/01/22	SRM	Emails regarding expert deposition.	.20
11/03/22	PKZ	Email from Veritext emails from/to J. Gutkoski regarding exhibit	.20
11/13/22	PKZ	Emails from/to J. Gutkoski and E. Olson regarding	.10
11/16/22	SRM	Attention to issue raised by E. Olson.	.20
11/16/22	PKZ	Look into issue and email to J. Gutkoski	.40
11/17/22	PKZ	Emails from/to S. Magee and J. Gutkoski regarding emails and scheduling date for motion hearing and email to client	.25
11/18/22	SRM	Further attention to issue; emails with P. Zacharakis regarding strategy and potential summary judgment hearing planning in light of Judge Sorokin	.60
11/18/22	PKZ	Draft summary of Sorokin J. session and email to S. Magee and J. Gutkoski; Emails from/to client, J. Gutkoski, and S. Magee regarding Search database for documents and email to target litigation	1.10
11/21/22	PKZ	Emails from/to target litigation regarding production of emails and produce recent email	.30
		TOTAL PROPEGGIONAL GERMAGEG	1 2 4 2 5

TOTAL PROFESSIONAL SERVICES

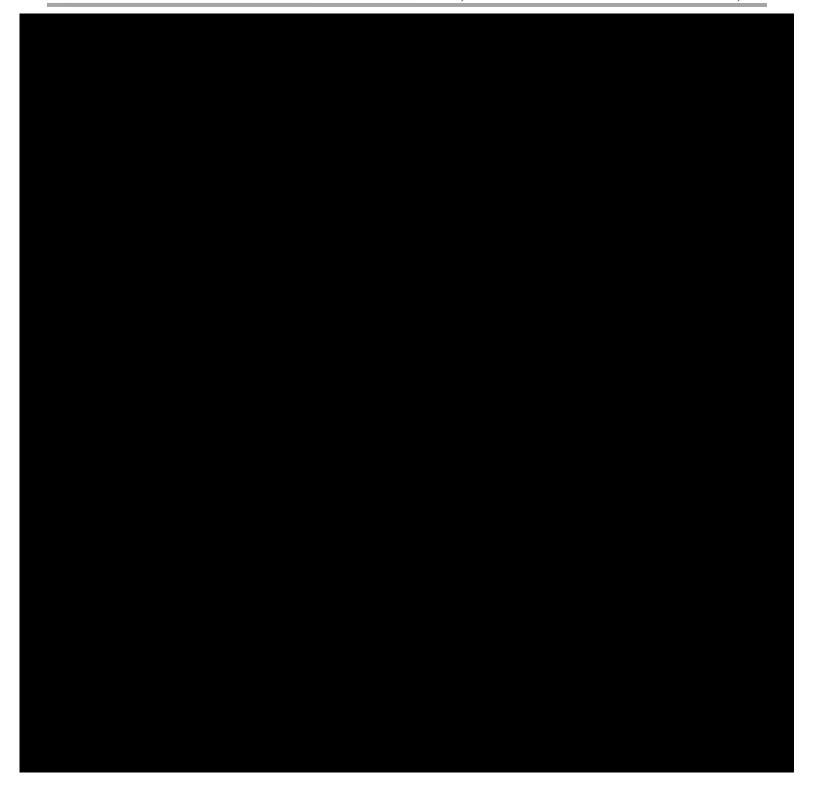
\$ 1,364.25

EXPENSES

Date	Description	Amount
11/10/22	Veritext LLC, Filing Fees, 11/10/2022, 6166555	1,642.70
	TOTAL EXPENSES	\$ 1,642.70

MATTER TOTAL

\$ 3,006.95



Invoice #: 269895 December 20, 2022

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
269236	11/09/22	10,325.25	.00	10,325.25
269237	11/09/22	7,074.86	.00	7,074.86

 Previous Balance
 \$ 17,400.11

 Total Due This Invoice
 \$ 5,483.70

 TOTAL BALANCE DUE
 \$ 22,883.81



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

December 20, 2022

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 269895 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 5,483.70

Previous Balance \$17,400.11

TOTAL BALANCE DUE \$22,883.81

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

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Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 249 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

January 6, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581

 Invoice #:
 271142

 Client #:
 10255

 Matter #:
 36384

 Billing Attorney:
 JCM

INVOICE SUMMARY

RE: KPM Analytics-NIR Senry

For professional services rendered through December 31, 2022:

Previous Balance	\$ 3,006.95
	·
TOTAL THIS INVOICE	\$ 398.96
Total Expenses	\$ 98.46
Professional Services	\$ 300.50

Please be advised that effective January 1, 2023, we will be raising our hourly rates. Please do not hesitate to call us if you have any questions about our rates on your bill.

Invoice #: 271142 January 6, 2023

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
12/05/22	SRM	Emails with J. Gutkoski regarding summary judgment hearing schedules; review Judge Sorokin schedules regarding same.	.50
12/27/22	PKZ	Meeting with J. Marrow regarding case status	.10
		TOTAL PROFESSIONAL SERVICES	\$ 300.50
EXPENSI			
EXPENSI Date		ription	Amount
Date	Desci	ription ason Reuters - West, Online research, 12/1/2022, 847487642	Amount 98.46
Date	Desci	*	

\$ 3,405.91

Invoice #: 271142 January 6, 2023

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
 NUMBER		TOTAL	RECEIVED	BALANCE
 269895	12/20/22	5,483.70	.00	5,483.70
	Previo	ous Balance		\$ 3,006.95
	Total	Due This Invoice		\$ 398.96

TOTAL BALANCE DUE

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 252 of 418



CityPoint
480 Totten Pond Road, 4th Floor
Waltham, MA 02451
morse.law
t -781-622-5930
f -781-622-5933
billing@morse.law

January 6, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 271142 Client #: 10255 Matter #: 36384 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics-NIR Senry

BALANCE DUE THIS INVOICE \$ 398.96

Previous Balance \$3,006.95

TOTAL BALANCE DUE \$3,405.91

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website **www.morse.law** and click

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Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 253 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

February 6, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through January 31, 2023.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 254 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

February 6, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 272158 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through January 31, 2023:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	407.00	.00	407.00
Total		1,536.50	.00	1,536.50

TOTAL THIS INVOICE \$ 1,536.50

Previous Balance \$ 213,795.66

TOTAL BALANCE DUE \$215,332.16

Invoice #: 272158 February 6, 2023

Invoice #: 272158 February 6, 2023

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

	Date	Atty	Description	Hours
1/2	20/23	PKZ	Emails from/to S. Magee regarding expert report and calculate counterclaim damages	.50
1/2	23/23	PKZ	Emails from/to S. Magee regarding ITG and Blue Sun Blue Sun expert report	.60
			TOTAL PROFESSIONAL SERVICES	\$ 407.00
			MATTER TOTAL	\$ 407.00
			TOTAL THIS INVOICE	\$ 1,536.50

Invoice #: 272158 February 6, 2023

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
269236	11/09/22	10,325.25	.00	10,325.25
269882	12/20/22	124,125.25	.00	124,125.25
269895	12/20/22	5,483.70	.00	5,483.70
271128	1/06/23	73,462.50	.00	73,462.50
271142	1/06/23	398.96	.00	398.96

TOTAL BALANCE DUE	\$ 215,332.16
Total Due This Invoice	\$ 1,536.50
Previous Balance	\$ 213,795.66



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

February 6, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 272158 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 1,536.50

Previous Balance \$213,795.66

TOTAL BALANCE DUE \$215,332.16

Make checks payable to:

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Waltham, MA 02451

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INVOICE IS PAYABLE UPON RECEIPT

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 259 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

March 15, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through March 6, 2023.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 260 of 418



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March 15, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 273564 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through March 6, 2023:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	15,725.00	.00	15,725.00
Total		18,598.00	95.00	18,693.00

TOTAL THIS INVOICE \$ 18,693.00

Previous Balance \$1,935.46

TOTAL BALANCE DUE \$20,628.46

${\bf MORSE, BARNES\text{-}BROWN \& PENDLETON, PC}$



Invoice #: 273564 March 15, 2023

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
2/06/23	SRM	Review and analyze order regarding summary judgment hearing; conference with P. Zacharakis regarding same.	.40
2/08/23	SRM	Attention to identification of key issues to address at motion hearing regarding summary judgment/injunction.	1.00
2/09/23	SRM	Review and analyze summary judgment briefing materials for preparation for motion hearing; emails with J. Gutkoski and P. Zacharakis regarding same.	2.60
2/10/23	SRM	Telephone conference with P. Zacharakis and J. Gutkoski regarding motion hearing; prepare for same.	1.10
2/10/23	PKZ	Prepare for and attend meeting with J. Gutkoski and S. Magee regarding summary judgment motion and motion to remove preliminary injunction	.90
2/13/23	SRM	Further analysis of briefing and exhibits thereto for preparation for motion hearing; emails with J. Gutkoski and P. Zacharakis regarding preparation for motion hearing.	3.00
2/13/23	PKZ	Review motions, memoranda in support, oppositions, and reply briefs in preparation for tomorrow's hearing and send J. Gutkoski and S. Magee preparation for afternoon meeting and attend preparation meeting for hearing tomorrow	2.75
2/14/23	SRM	Attend motion hearing and debrief afterwards; emails regarding same.	2.00
2/14/23	PKZ	Emails from/to J. Gutkoski regarding , prepare for motion hearing, attend motion hearing and debrief call with client, S. Magee, and J. Gutkoski	2.00
2/16/23	SRM	Review and analyze memorandum and order on motion for summary judgment and motion to modify injunction; conference with J. Marrow regarding same; emails with J. Gutkoski and P. Zacharakis regarding same and regarding trial planning; attention to trial schedule issues.	2.10
2/16/23	PKZ	Emails from/to J. Gutkoski and S. Magee regarding court order and review order on motion for summary judgment and motion to dissolve or modify the preliminary injunction	.30
2/20/23	SRM	Attention to trial planning; emails with J. Gutkoski and P. Zacharakis regarding same.	1.10
2/21/23	PKZ	Emails from/to J. Gutkoski and S. Magee and email to K. Olson regarding deposition charts	.20
2/22/23	PKZ	Meeting with K. Olson regarding	.10

Invoice #: 273564 March 15, 2023

Date	Atty	Description	Hours
2/23/23	SRM	Attention to potential witnesses for trial.	.50
2/27/23	SRM	Begin review and analysis of deposition testimony for determination of issues to be used, rebutted, and otherwise addressed at trial; emails with J. Gutkoski and P. Zacharakis regarding trial planning and trial schedule.	2.80
2/27/23	PKZ	Emails from/to J. Gutkoski and S. Magee regarding witnesses and supplemental initial disclosures, emails from/to K. Olson and S. Magee regarding review deposition transcript and exhibit chart, emails from/to J. Gutkoski and S. Magee regarding possible third party witnesses	.70
2/28/23	SRM	Attention to trial date issues; emails with J. Gutkoski and P. Zacharakis regarding same; attention to document analysis and preparation for trial.	1.10
2/28/23	PKZ	Emails from/to S. Magee regarding questions, emails to/from J. Gutkoski regarding question, and email to opposing counsel regarding rescheduling trial	.30
3/01/23	SRM	Attention to trial date proposals; emails with J. Gutkoski and P. Zacharakis regarding same.	.70
3/01/23	PKZ	Emails from/to J. Gutkoski, S. Magee and K. Mosier regarding deposition transcript and scheduling trial prep call, emails from/to Sunstein team regarding deposition transcripts and exhibits upload, emails from/to J. Gutkoski regarding defense expert deposition transcript to N. Zoltowski and M. Boom, emails from/to N. Zoltowski and M. Boom with requested documents, email to target litigation regarding setting up Sunstein in Insight	.60
3/02/23	SRM	Telephone conference with all counsel regarding trial scheduling; prepare for same.	.50
3/02/23	PKZ	Email to target litigation regarding attend counsel call regarding rescheduling trial dates	1.20
3/03/23	PKZ	Emails from/to target litigation regarding , email to Sunstein team regarding depositions on database, organize E. Olson deposition exhibits, attend trial preparation meeting, prepare deposition transcripts for review and begin deposition review	2.50
3/04/23	PKZ	Deposition transcript review	.70
3/05/23	PKZ	Deposition transcript review	1.90

TOTAL PROFESSIONAL SERVICES \$ 15,725.00

MATTER TOTAL \$ 15,725.00

Invoice #: 273564 March 15, 2023

Invoice #: 273564 March 15, 2023

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
271142	1/06/23	398.96	.00	398.96
272158	2/06/23	1,536.50	.00	1,536.50

Previous Balance \$ 1,935.46

Total Due This Invoice \$18,693.00

TOTAL BALANCE DUE \$20,628.46

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 266 of 418



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f -781-622-5933
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March 15, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 273564 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 18,693.00

Previous Balance \$1,935.46

TOTAL BALANCE DUE <u>\$20,628.46</u>

Make checks payable to:

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Waltham, MA 02451

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April 7, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through March 31, 2023.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 268 of 418



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April 7, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 274649 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through March 31, 2023:

Matter #	Description	Services	Expenses	Total	
36384	KPM Analytics-NIR Senry	17,482.50	.00	17,482.50	
Total		19,020.50	.00	19,020.50	

TOTAL THIS INVOICE \$ 19,020.50

Previous Balance \$18,693.00

TOTAL BALANCE DUE \$37,713.50



Invoice #: 274649 April 7, 2023

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
3/03/23	SRM	Trial preparation meeting with trial team; prepare for same; begin deposition review and analysis; multiple emails regarding trial prep.	2.60
3/06/23	SRM	Attention to Schumann testimony for trial; emails regarding length of trial.	2.00
3/07/23	PKZ	Finish review of M. Smith deposition transcript in preparation for trial	1.20
3/08/23	SRM	Work on deposition and exhibit review for trial use; emails with P. Zacharakis regarding same.	2.50
3/08/23	PKZ	Review D. Evans deposition transcript for trial preparation	1.20
3/09/23	SRM	Analyze M. Gajewski and L. Faustini deposition transcripts and corresponding exhibits for use at trial.	4.50
3/13/23	PKZ	Emails from/to Sunstein regarding missing documents, search for and send missing documents to for production to Sunstein	.50
3/16/23	SRM	Review order regarding judge reassignment; analysis of and emails with K. Mosier and trial team regarding same; research	2.10
3/16/23	PKZ	Emails from/to S. Magee and Sunstein team regarding reassignment of case notice and meeting with S. Magee regarding new judge	.30
3/28/23	SRM	Status conference with judge and all counsel regarding trial date and trial preparation; Zoom call with trial team regarding trial preparation; work on review of Eilert transcript and related exhibits for identification of potential evidence for trial; consideration of potential motions in limine and evidentiary issues.	7.50
3/28/23	PKZ	Prepare for and attend status conference, call with S. Magee regarding status conference, emails from/to plaintiff's counsel team regarding logistics and meeting with plaintiff's counsel team regarding trial logistics and deadlines	1.20
3/29/23	SRM	Review and analyze Glenister and Schumann deposition transcripts and related exhibits for relevance to trial evidence; emails with trial team regarding deposition review and trial planning.	5.20
3/29/23	PKZ	Emails from/to Sunstein team regarding signature pages for deposition transcripts	.10
3/30/23	SRM	Emails regarding deposition evidence for trial; attention to evidentiary issues for trial.	.70

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 271 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

April 7, 2023

Date	Atty	Description	Hours
3/31/23	SRM	Zoom call with trial team regarding trial planning; review potential motion in limine arguments regarding injunction; emails regarding same.	1.00
3/31/23	PKZ	Plaintiff's counsel team meeting regarding trial strategy	.60

TOTAL PROFESSIONAL SERVICES	\$ 17,482.50
MATTER TOTAL	\$ 17,482.50



Invoice #: 274649 April 7, 2023

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
273564	3/15/23	18,693.00	.00	18,693.00

Previous Balance \$ 18,693.00

Total Due This Invoice \$19,020.50

TOTAL BALANCE DUE \$37,713.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 274 of 418



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April 7, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 274649 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 19,020.50

Previous Balance \$18,693.00

TOTAL BALANCE DUE \$37,713.50

Make checks payable to:

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Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 275 of 418



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May 9, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through April 30, 2023.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 276 of 418



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May 9, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 275439 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through April 30, 2023:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	104,802.50	.00	104,802.50
Total		108,197.50	291.89	108,489.39

TOTAL THIS INVOICE \$ 108,489.39

Previous Balance \$24,067.00

TOTAL BALANCE DUE \$ 132,556.39

Invoice #: 275439 May 9, 2023

Invoice #: 275439 May 9, 2023

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
4/04/23	SRM	Attention to emails regarding trial preparation.	.60
4/05/23	SRM	Emails with trial team and opposing counsel regarding deposition designation; exhibits; witnesses, and trial prep; emails with expert regarding	.50
4/05/23	PKZ	Emails from/to client and J. Gutkoski and attend client meeting	.80
4/06/23	SRM	Conference with P. Zacharakis regarding trial preparation and deposition designations; videoconference with trial team regarding depositions designation, exhibits, trial strategy; trial witnesses; review notes regarding deposition and potential trial testimony; work on Brown, M. Gajewski, Faustini and Evans deposition designations.	5.50
4/06/23	PKZ	Review emails from J. Gutkoski, S. Magee, client, damages expert, and opposing counsel, emails to/from plaintiff counsel team, meeting with S. Magee regarding trial preparation, compose notes for W. Brown and D. Evans, and call with plaintiff counsel team	3.70
4/07/23	SRM	Work on review of exhibits and interrogatory answers for identifying exhibits for use at trial; numerous emails with trial team regarding same; telephone conference with P. Zacharakis regarding same; analyze and comment on deposition designations for Weinstein, Davies, McIntyre, and Evans.	12.10
4/07/23	PKZ	Review and annotate C. McIntire deposition transaction for designations, edit D. Evans notes for deposition designations, review and annotate E. Weinstein deposition for designations, compile bates stamps list for additional trial exhibits, emails from/to target litigation regarding emails to/from client and emails to/from S. Magee	7.10
4/08/23	SRM	Review P. Zacharakis deposition designations for R. Geis; attention to identification of exhibits.	1.20
4/08/23	PKZ	Emails from/to Plaintiff's counsel team and review and annotate R. Geis deposition for designations	
4/09/23	SRM	Attention to deposition designations and exhibit list.	1.00
4/10/23	SRM	Videoconference with B. Schumann and E. Olson regarding; prepare for same; update trial team regarding same; prepare Schumann deposition designations for use at trial.	4.80

Invoice #: 275439 May 9, 2023

Date	Atty	Description	Hours
4/10/23	PKZ	Emails from/to Plaintiff's counsel team, prepare trial exhibit lists, emails from/to client and Plaintiff's counsel team regarding	3.40
4/11/23	SRM	Attention to exhibit, witness and deposition designations from defendants; emails with trial team regarding same; outline proposed issues for pretrial memorandum and pretrial filings; telephone conference with trial team regarding deposition designations, exhibits, pretrial memo, witness lists, and general trial preparation.	
4/11/23	PKZ	Review pre-trial disclosure documents from defendants, emails from/to Plaintiff's counsel team regarding next steps and call with Plaintiff's counsel team regarding next steps	.80
4/12/23	SRM	Attention to trial exhibits; work on deposition designations; review order regarding trial deadlines; attention to witness issues for trial.	3.50
4/12/23	PKZ	Emails from/to Plaintiff's counsel team regarding reaching out to defendants trial exhibits, and pretrial order schedule	.10
4/13/23	SRM	Work on objections and counterdesignations to deposition transcripts for trial; attention to exhibits and exhibit lists.	4.70
4/13/23	PKZ	Emails from/to S. Ramsdell regarding trial exhibits, hardware needs for trial, and errata sheets call with S. Magee regarding deposition designation, and email to S. Magee	.70
4/14/23	PKZ	Emails to/from S. Ramsdell regarding defendants exhibits	.10
4/17/23	SRM	Work on trial preparation, including review of objections to exhibits, deposition designations and counterdesignations; begin preparation of R. Schumman examination for trial.	
4/17/23	PKZ	Review defendants' deposition designations for objections, emails from/to Plaintiff's counsel team regarding deadline today and edit final objection designation document	
4/18/23	SRM	Work on trial preparation, including review and analysis of objections to proposed trial exhibits; develop responses to objections; attention to objections and counterdesignations regarding deposition designations; numerous emails with team regarding trial strategy and logistics.	6.40
4/18/23	PKZ	Emails from/to S. Ramsdell regarding trial exhibits, emails from/to Plaintiff's counsel team regarding Defendants' objections to trial exhibits and deposition designations, and review defendants objections to trial exhibits	2.30
4/19/23	SRM	Work on responses to objections to deposition designations; review draft motion in limine regarding preliminary injunction; videoconference with team regarding trial preparation; work on strategy for trial; numerous emails regarding same; initial review of joint pretrial memorandum and jury instructions.	6.50

Invoice #: 275439 May 9, 2023

Date	Atty	Description	Hours
4/19/23	PKZ	Meeting with S. Magee regarding tasks to be completed today and email to target litigation	5.70
4/20/23	SRM	Conference with E. Olson, B. Mitchell and J. Gutkoski regarding meet and confer with defendants counsel and trial team regarding objections, witnesses, motions in limine; conference with trial team regarding same; work on opposition to motion in limine regarding veil piercing; trial preparation.	7.20
4/20/23	PKZ	Exhibit list prepare for and attend meet and confer with opposing counsel, meeting with internal Plaintiff's counsel team, and emails from/to internal Plaintiff's counsel team and opposing counsel	4.80
4/21/23	SRM	Work on joint pretrial memorandum and exhibits to same; review and analyze defendants' proposed sections of joint pretrial memorandum; begin to outline Glenister and Schuman testimony and themes; attention to themes for use at trial and expected themes and factual and legal theories expected from defendants.	6.50
4/21/23	PKZ	Emails from J. Gutkoski and S. Magee regarding adverse inference for emails from damages expert regarding emails, review and annotate pretrial memo and email to plaintiff's counsel team	2.50
4/22/23	SRM	Work on revisions to joint pretrial memorandum; emails regarding same; research regarding issues of law for joint pretrial memorandum; review objections to deposition designations and provide responses regarding same; work on voir dire questions and jury verdict form; edit trial brief.	8.10
4/22/23	PKZ	Review defendants' additions to the pretrial memo, email to plaintiffs' trial counsel with thoughts on defendants' additions to pretrial memo and emails to/from S. Magee	.60
4/23/23	SRM	Work on trial preparation including joint pretrial memorandum, voir dire, deposition designations and objections, exhibits.	4.20
4/23/23	PKZ	Emails from/to plaintiff's counsel team and continue to prepare exhibit list	4.60
4/24/23	SRM	Settlement videoconference with opposing counsel and client; work on and comment on joint pretrial memorandum, trial strategy, motions in limine, voir dire issues, witness preparation issues; emails with team regarding same; attention to expected veil piercing arguments in motions in limine; edit jury instruction.	10.20
4/24/23	PKZ	Emails from/to plaintiff's counsel team regarding tasks for today and meeting with plaintiff's counsel team, emails from/to S. Ramsdell regarding trial exhibits, emails from/to client call with S. Magee, file final pretrial memorandum documents	2.20
4/25/23	SRM	Work on Glenister cross-examination preparation; work on Schumann examination preparation; attention to jury instructions, motions in limine, verdict form, voir dire, and final trial brief.	10.10

Invoice #: 275439 May 9, 2023

Date	Atty	Description	Hours	
4/25/23	PKZ	Emails from/to plaintiffs' trial team regarding trial brief and motions in limine, emails from/to S. Ramsdell and target litigation regarding defendant exhibit question, compose exhibits for motions in limine and find record citation for motion in limine	3.90	
4/26/23	SRM	Trial preparation, including conference with KPM witnesses, drafting opposition to motion in limine regarding veil piercing, editing opposition to motion in limine regarding trade secret identification; continue work on drafting Glenister cross examination and Schumann direct examination.		
4/26/23	PKZ	Emails from/to plaintiffs' counsel team regarding request for the court for separate motion filings, edit motions in limine, draft and edit proposed orders for motions in limine, call with K. Mosier, review and annotate defendants motion in limine to preclude KPM's trade secrets, draft and edit opposition to defendants motion in limine to preclude KPM's trade secrets, create exhibits for opposition to defendants motion in limine to preclude KPM's trade secrets, emails from/to plaintiffs' counsel team regarding oppositions to motions in limine	8.00	
4/27/23	SRM	Edit and finalize oppositions to motions in limine; telephone conferences with P. Zacharakis regarding same; legal research for use in opposition to motion in limine regarding veil piercing; review oppositions filed by defendants to KPM motions in limine; begin preparation for pretrial conference; work on witness examinations.	7.60	
4/27/23	PKZ	Emails from/to plaintiffs' counsel team regarding and preparing as trial exhibits, edit opposition to motion in limine (trade secrets), emails from/to M. Boom regarding dependence of the secrets, emails from/to target litigation regarding producing updated KPM financials, emails from/to plaintiffs counsel team regarding citations to trial exhibits, calls with S. Magee regarding opposition to MIL (hearsay), edit opposition to MIL (hearsay), finalize and file opposition to MILs (hearsay, trade secrets, and veil piercing), create exhibit for opposition to MIL (veil piercing), produce updated document, and annotate exhibit list	8.70	
4/28/23	SRM	Prepare for and attend final pretrial conference; trial team meeting after final pretrial conference.	10.30	
4/28/23	PKZ	Emails from/to plaintiffs' counsel team regarding opposition to KPM motion in limine (exhibits not previously produced) and possible arguments, prepare for final trial conference, travel to/from and attend final trial conference and meeting with plaintiffs counsel team		
4/29/23	SRM	Work on trial preparation, witness examinations; overall trial strategy and Rule 609 motion regarding I. Lucas.	4.50	
4/29/23	PKZ	Annotate exhibit list and email to S. Magee and J. Gutkoski	1.30	
4/30/23	SRM	Work on trial preparation, strategy, witness outline and exhibits for use at trial.	4.20	

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 282 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

			3 /
Date	Atty	Description	Hours
4/30/23	PKZ	Emails from/to S. Ramsdell and J. Gutkoski, emails from/to K. Mosier	.20
		TOTAL PROFESSIONAL SERVICES	\$ 104,802.50
		MATTER TOTAL	\$ 104,802.50



TOTAL THIS INVOICE

\$ 108,489.39

Invoice #: 275439 May 9, 2023

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
274626	4/07/23	5,046.50	.00	5,046.50
274649	4/07/23	19,020.50	.00	19,020.50

Previous Balance \$24,067.00

Total Due This Invoice \$108,489.39

TOTAL BALANCE DUE \$132,556.39

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 285 of 418



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May 9, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 275439 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 108,489.39

Previous Balance \$24,067.00

TOTAL BALANCE DUE \$132,556.39

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Waltham, MA 02451

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CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

June 7, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through May 31, 2023.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 287 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

June 7, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 276917 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through May 31, 2023:

Matter #	Description	Services	Expenses	Total
36384	KPM Analytics-NIR Senry	153,013.50	.00	153,013.50
Total		153,684.50	313.53	153,998.03

TOTAL THIS INVOICE \$ 153,998.03

Previous Balance \$110,022.89

TOTAL BALANCE DUE \$264,020.92

Invoice #: 276917 June 7, 2023

Invoice #: 276917 June 7, 2023

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
5/01/23	SRM	Trial preparation, including Schumann examination outline and exhibits, conferences with trial team and E. Olson regarding strategy; notes regarding opening statement.	12.20
5/01/23	PKZ	Travel to Worcester, emails from/to plaintiffs trial team, emails from opposing counsel, trial preparation with E. Olson and J. Gutkoski and meeting with J. Gutkoski and S. Magee regarding trial preparation	8.50
5/02/23	SRM	Trial preparation, including witness preparation, exhibit preparation, overall strategy; Schumann and Glenister examination preparation.	11.90
5/02/23	PKZ	Download entity defendants exhibits and share with target litigation and plaintiffs counsel team, witness preparation with E. Olson and J. Gutkoski, final preparations of trial exhibits and email updated exhibits to opposing counsel	9.70
5/03/23	SRM	Trial day 1, jury selection, opening statements; work with R. Schumann on direct testimony, videoconference with day 1 update; edit opening statement.	12.70
5/03/23	PKZ	Edit opening and email to plaintiff's counsel team, emails from/to S. Ramsdell regarding final preparation for trial, trial day one, prepare E. Olson for testimony tomorrow, meeting with plaintiffs counsel team regarding trial preparation, and defendant exhibit review	12.90
5/04/23	SRM	Trial Day 2; direct examination of B. Schumann; Conferences with trial team regarding strategy, update; work in preparation for Trial Day 3.	12.90
5/04/23	PKZ	Edit exhibit list, trial day 2, client meeting, meeting with plaintiffs' counsel team, preparation for trial day 3	9.00
5/05/23	SRM	Trial day 3; prepare for same; post-trial analysis regarding trial day 3; work on preparing strategy for second week of trial; conferences with trial team regarding same.	8.20
5/05/23	PKZ	Preparation for trial day 3, trial day 3, meetings with plaintiff's counsel team, meeting with clients, and travel from Worcester	8.00
5/06/23	SRM	Work on trial strategy for week 2; attention to witness examinations.	3.50
5/06/23	PKZ	Emails from/to client and email to court reporter regarding correcting appearances portion of transcript	.20
5/07/23	SRM	Trial preparation for trial day 4; attention to exhibits, witness examinations, deposition transcripts.	9.00

Invoice #: 276917 June 7, 2023

Date	Atty	Description	Hours
5/07/23	PKZ	Travel to Worcester, emails from/to plaintiff's counsel team, edit exhibit spreadsheet, meetings with plaintiff's counsel team in preparation for trial day 4	7.50
5/08/23	PKZ	Trial day 4, meetings with plaintiff's counsel team, client meeting, preparation for trial day 5	12.90
5/09/23	SRM	Trial Day 5; trial prep for day 6; conferences with client and trial team regarding strategy and tactics; work on examinations of Smith, Eilert, Glenister.	13.10
5/09/23	PKZ	Trial day 5, client meeting, meeting with plaintiffs' counsel team, review A. Eilert deposition transcript, draft A. Eilert outline, preparation for trial day 6	17.30
5/10/23	SRM	Trial day 6; final preparation for Glenister cross examination; team meeting regarding strategy and update; prepare for day 7, including preparation of M. Smith and A. Eilert testimony; work with E. Olson regarding M. Smith testimony; work with P. Zacharakis regarding deposition transcripts and A. Eilert testimony; review research regarding jury instructions.	12.90
5/10/23	PKZ	Trial day 6, edit exhibit list, client meeting, meeting with plaintiffs' counsel team, continue A. Eilert outline, preparation for trial day 7	15.60
5/11/23	SRM	Trial Day 7; prepare for trial day 8; work on M. Smith examination and prepare for testimony if needed; conferences with team and client regarding trial strategy.	11.50
5/11/23	PKZ	Trial Day 7, review jury instructions, review possible exhibits for M. Smith, client call, meetings with plaintiff's trial team and client, edit A. Eilert outline and prepare for trial day 8	14.70
5/12/23	SRM	Trial Day 8; prepare for trial day 9; work on final expert witness preparation; trial team meetings with client; review edited jury instructions.	11.10
5/12/23	PKZ	Review A. Eilert outline, trial day 8, client meeting, meeting with plaintiffs' counsel team and travel home from Worcester	8.70
5/13/23	SRM	Review and analysis of trial transcripts for preparation for closing arguments; emails with team regarding same.	3.50
5/13/23	PKZ	Emails from/to plaintiff's counsel team regarding updated Kennedy expert report and topics for closing argument and begin review of transcripts for closing argument preparation	1.10
5/14/23	SRM	Prepare for trial; review and analyze Olson and Glenister testimony for closing arguments; work on directed verdict issues; work on closing arguments and team meeting regarding same.	9.60
5/14/23	PKZ	I. Lucas testimony review for closing, R. Gajewski testimony review for closing, A. Eilert testimony review for closing, R. Wilt testimony review for closing, travel to Worcester, meeting with plaintiff's counsel team regarding preparation for trial and update exhibit list	9.00

Invoice #: 276917 June 7, 2023

Date	Atty	Description	Hours
5/15/23	SRM	Trial day 9, prepare for trial day 10; work on jury instructions and verdict form; conferences with team regarding same.	12.50
5/15/23	PKZ	Trial day 9, prepare for closing arguments, review closing slides, review submission to the court regarding willful and malicious jury instructions, review draft jury instructions from court, and meetings with plaintiff's counsel team	9.70
5/16/23	SRM	Trial Day 10; review and comment on closing arguments; team meeting regarding strategy; work on jury instructions and objections thereto.	8.30
5/16/23	PKZ	Trial day 10, closing arguments and meetings with plaintiff counsel team	9.50
5/17/23	SRM	Trial Day 11; work on response to jury questions, consider verdict and next steps; conference with clients and trial team regarding same.	8.00
5/17/23	PKZ	Trial day 11, client recap meeting, and travel home from Worcester	5.80
5/18/23	SRM	Next steps, strategy; research regarding bill of costs for submission to court.	2.00
5/18/23	PKZ	Emails from/to J. Gutkoski regarding final trial exhibit list	.10
5/23/23	SRM	Attention to post-verdict motions, briefing schedule, and next steps.	.90
5/23/23	PKZ	Call with S. Magee regarding email from K. Mosier about briefing schedule	.10
5/25/23	SRM	Follow up regarding post-trial briefing; emails regarding same; begin to outline issues for 93A and multiple damages briefing.	1.00
5/26/23	SRM	Attention to post-trial briefing issues; emails regarding schedule.	.60
5/30/23	SRM	Videoconference with trial team regarding post-trial briefing; emails regarding same; prepare for same; work on research for fee petition regarding same.	2.60
5/30/23	PKZ	Attend meeting with plaintiff's counsel team regarding post-trial briefing schedule	.40
5/31/23	SRM	Attention to post-trial briefing; telephone conference with P. Zacharakis regarding same.	.50
5/31/23	PKZ	Call with S. Magee regarding post-trial research	.10

TOTAL PROFESSIONAL SERVICES	\$ 153,013.50
MATTER TOTAL	\$ 153,013.50
TOTAL THIS INVOICE	\$ 153,998.03

Invoice #: 276917 June 7, 2023

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
275423	5/09/23	1,533.50	.00	1,533.50
275439	5/09/23	108,489.39	.00	108,489.39

Previous Balance \$110,022.89

Total Due This Invoice \$153,998.03

TOTAL BALANCE DUE <u>\$264,020.92</u>

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 293 of 418



CityPoint
480 Totten Pond Road, 4th Floor
Waltham, MA 02451
morse.law
t -781-622-5930
f -781-622-5933
billing@morse.law

June 7, 2023

KPM Analytics, Inc. 8 Technology Drive Westborough, MA 01581 Invoice #: 276917 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 153,998.03

Previous Balance \$110,022.89

TOTAL BALANCE DUE \$264,020.92

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Credit Card Instructions: Please visit our website **www.morse.law** and click

"payments" at the bottom of the page.

Wire Instructions:

For domestic wire payments: Cambridge Trust

For international wire payments: (USD denominated)

Cambridge Trust

INVOICE IS PAYABLE UPON RECEIPT

Invoice #: 278142 July 13, 2023

Client-Matter: 10255-36384

RE: KPM Analytics-NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
5/08/23	SRM	Trial day 4; prepare for trial day 5; work on Lucas and Glenister examinations and related exhibits; team conference regarding update from day 4; analysis of deposition designations; comment on and edit brief regarding Rule 609(a) issue.	14.00
6/05/23	SRM	Work on post-trial briefing; review and analyze trial record for evidence concerning violation of preliminary injunction; emails with team regarding same.	6.50
6/06/23	SRM	Attention to emails from client regarding violation of injunction; review trial record in light of same.	1.50
6/06/23	PKZ	Emails from plaintiff's counsel team regarding post trial briefing and permanent injunction arguments	.20
6/08/23	PKZ	Emails from/to target litigation, search in plaintiff's counsel team regarding documents and email to S. Magee regarding post-trial briefing	.30
6/13/23	SRM	Work on post-trial briefing; review K. Mosier draft regarding attorneys' fees; review and analyze for 93A-related evidence; legal research regarding same.	6.90
6/14/23	PKZ	Legal research for trade secret post trial brief	2.70
6/15/23	PKZ	Draft memo in support of trade secret brief, legal research for trade secret brief, and email to S. Magee	2.50
6/16/23	SRM	Continued work on post-trial briefing and analysis of trial record for same.	7.10
6/17/23	SRM	Review J. Gutkoski edits to attorneys' fee brief.	.50
6/18/23	SRM	Review and analyze brief regarding exemplary damages under misappropriation of trade secret counts.	1.10
6/19/23	SRM	Work on post-trial briefing, including Chapter 93A brief, prejudgment interest issues, and preliminary injunction violation.	9.00
6/20/23	SRM	Edits to 93A brief; review J. Gutkoski edits regarding same; edit declaration for attorneys' fee award; telephone conferences with J. Gutkoski and P. Zacharakis regarding briefs; legal research regarding same.	8.00
6/20/23	PKZ	Emails from/to S. Magee regarding trade secret misappropriation brief, emails from plaintiff's counsel team, edit S. Magee declaration regarding attorney's fees, edit memo in support of motion for 93A damages, and call with S. Magee	5.00

Invoice #: 278142 July 13, 2023

Date	Atty	Description	Hours
6/21/23	SRM	Continued editing and drafting of post-trial briefs; numerous emails with trial team regarding same; research regarding same; finalize and file post-trial briefs.	8.00
6/21/23	PKZ	Edit memo in support of motion for trade secret misappropriation, edit memo in support of motion for 93A finding, draft and edit motion for trade secret misappropriation, emails from/to plaintiff's counsel team regarding filings today, call and meetings with S. Magee regarding memos in support of 93A findings and trade secret misappropriation, emails from/to S. Magee regarding E. Olson declaration, draft and edit E. Olson declaration, emails from/to target litigation regarding exhibits to E. Olson declaration, prepare exhibits for E. Olson declaration, call with E. Olson regarding review, finalize, and file E. Olson Declaration, motion and memo in support of motion for trade secret misappropriation	8.00
6/22/23	SRM	Review, analyze, and comment on defendants' motions to alter or amend judgment.	.90
6/22/23	PKZ	Review post-trial filings and organize case file	1.00
6/23/23	PKZ	Review defendants' post trial briefs, emails to/from plaintiff counsel team regarding defendants' post trial briefs and emails to clients with post-trial filings	1.30
6/26/23	SRM	Conference with trial team regarding planned responses to defendants' post-trial motions; prepare for same.	1.00
6/26/23	PKZ	Meeting with plaintiff's counsel team regarding opposition to defendants' motions	.50

TOTAL PROFESSIONAL SERVICES	\$ 43,752.50
Less Discount	\$ -7,770.00
NET PROFESSIONAL SERVICES	\$ 35,982.50

EXPENSES

Date	Description	Amount
5/01/23	Meals during KPM Trial	103.10
5/01/23	Thomson Reuters - West, Online research, 5/1/2023, 848291922	172.72
5/04/23	Parking for KPM Trial	8.00
5/07/23	Meals during KPM Trial	34.81
5/08/23	Meals during KPM Trial	50.17
5/08/23	Meals during KPM Trial	5.30
5/09/23	Meals during KPM Trial	138.63

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 296 of 418

MORSE, BARNES-BROWN & PENDLETON, PC

\$ 37,326.42

Invoice #: 278142 July 13, 2023

Date	Description	Amount
5/12/23	Meals during KPM Trial	182.04
5/12/23	Parking for KPM Trial	8.00
5/14/23	Meals during KPM Trial	79.20
5/16/23	Dinner w/PKZ and clients	398.66
5/17/23	Meals during KPM Trial	141.25
5/31/23	Paige Zacharakis, Local travel, 5/31/2023, Parking for Pre-Trial Conference	6.00
5/31/23	PAIGE ZACHARAKIS, Meal, 5/31/23, Dinner expense	16.04
	TOTAL EXPENSES	\$ 1,343.92

MATTER TOTAL



CityPoint
480 Totten Pond Road, 4th Floor
Waltham, MA 02451
morse.law
t -781-622-5930
f -781-622-5933
billing@morse.law

April 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757

RE: KPM Analytics, Inc.

Enclosed please find our invoice for professional services rendered through March 31, 2021.

Should you have any questions concerning the attached invoice, please do not hesitate to contact us. Your prompt payment would be greatly appreciated.

Sincerely yours,

Joseph C. Marrow

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 298 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

April 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 242803 Client #: 10255 Billing Attorney: JCM

INVOICE SUMMARY

RE: KPM Analytics, Inc.

For professional services rendered through March 31, 2021:

Matter #	Description	Services	Expenses	Total
36384	NIR Senry	65,354.00	.00	65,354.00
Total		73,021.50	.00	73,021.50

TOTAL THIS INVOICE \$73,021.50

Previous Balance \$5,812.69

TOTAL BALANCE DUE \$78,834.19

Invoice #: 242803 April 9, 2021

Client-Matter: 10255-34238

RE: KPM Analytics-Employment

PROFESSIONAL SERVICES

Invoice #: 242803 April 9, 2021

Client-Matter: 10255-36384

RE: NIR Senry

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
3/18/21	JCM	Conference with M. Mitchell; Conference call with KPM team and M. Mitchell.	1.00
3/18/21	JTG	Call with M. Mitchell; begin review of background materials.	1.70
3/19/21	JCM	Conference with J. Gutkoski; Conference call with KPM and J. Gutkoski regarding potential litigation.	.90
3/19/21	JTG	Review materials and emails; call with client team; plan strategy options.	2.30
3/23/21	MLM	Research employee poaching standards; preparation of drafting Complaint.	1.10
3/23/21	JTG	Call with client and review of factual materials; discussion with internal team regarding review of relevant law and legal options; attention to trade secret law issues.	5.70
3/24/21	SRM	Telephone conference regarding background to Blue Sun dispute; research regarding DTSA and federal claims; draft summary of federal claims and email same to J. Gutkoski and P. Zacharakis.	4.50
3/24/21	JTG	Review employment agreements and materials' call with client; attention to legal questions and authorities.	6.20
3/24/21	PKZ	Email to S. Magee and J. Gutkoski with summary of example documents for Complaint, Motion for Preliminary Injunction and Expedited Discovery Call with J. Gutkoski and S. Magee regarding new matter	1.20
3/25/21	JCM	Conference call with working group; Attention to email correspondence.	1.00
3/25/21	SRM	Analyze background information from client; review cases for key pleading requirements and preliminary injunction	4.20
3/25/21	JTG	Further attention to factual details; answer questions on potential causes of action; prepare for and conduct call with client; attention to preliminary injunction recent decisions.	5.50
3/25/21	PKZ	Email from/to J. Gutkoski regarding draft Preliminary Injunction Briefs Email from/to J. Gutkoski regarding draft Preliminary Injunction Briefs Review federal law summary of asserting trade secret misappropriation claim Legal research into trade secret misappropriation Call with S. Magee and J.	6.30
		Gutkoski regarding outline of Preliminary Injunction brief Attention to documents and email same to S. Magee and J. Gutkoski Review of Initial Documents from Client	

Invoice #: 242803 April 9, 2021

Date	Atty	Description	Hours
3/26/21	MLM	Draft and revise letter.	.60
3/26/21	SRM	Begin drafting verified complaint.	1.50
3/26/21	JTG	Attention to counterclaims and	4.10
3/26/21	PKZ	Email to J. Gutkoski regarding Memo in Support of Motion for Preliminary Injunction Legal research and document review in preparation for preliminary injunction brief Begin draft of Motion and Memo in Support of Motion for Preliminary Injunction	2.10
3/27/21	SRM	Review draft preliminary injunction memorandum and motion.	.90
3/27/21	JTG	Continued review of factual materials and law; address potential claims and elements of injunction brief.	3.70
3/27/21	PKZ	Draft Memo in Support of Motion for Preliminary Injunction and email to J. Gutkoski	1.40
3/28/21	SRM	Analyze documents from client; continue drafting Verified Complaint.	3.70
3/28/21	JTG	Questions on verified complaint; internal emails regarding brief; review legal authorities.	2.80
3/29/21	SRM	Continue drafting verified complaint; emails with J. Gutkoski and P. Zacharakis regarding same; review and comment on memorandum in support of motion for preliminary injunction; research regarding jurisdiction	9.30
3/29/21	JTG	Review data summaries and conduct call with client regarding additional investigation; attention to format for injunction brief; attention to counterclaims and edit descriptions of data.	6.40
3/29/21	PKZ	Legal Research for Memorandum in Support of Motion for Preliminary Injunction Email from/to J. Gutkoski regarding research for Memorandum in Support of Motion for Preliminary Injunction Emails from/to K. Olson regarding Email to J. Gutkoski and S.	3.75
		Magee regarding Causes of Action Draft Memorandum in Support of Motion for Preliminary Injunction Email from/to S. Magee and J. Gutkoski regarding comments on Memo in Support of Motion for Preliminary Injunction	
3/30/21	SRM	Review and analyze J. Gutkoski edits to verified complaint; emails with J. Gutkoski and P. Zacharakis regarding preliminary injunction filings, verified complaint; analyze materials from client for incorporation into verified complaint and make edits to same.	6.50
3/30/21	JTG	Revise and augment draft complaint; emails with client ; review legal issues; attention to draft motion; internal emails regarding legal options.	8.80
3/30/21	PKZ	Edit Memorandum in Support of Motion for Preliminary Injunction	2.40

Invoice #: 242803 April 9, 2021

Date	Atty	Description	Hours
3/30/21	PKZ	Emails from/to J. Gutkoski and S. Magee regarding organization of the Memorandum in Support of the Motion for Preliminary Injunction Email to S. Magee and J. Gutkoski regarding Motion for Preliminary Injunction and Memorandum in Support edits and email to S. Magee and J. Gutkoski Legal research for Memorandum in Support of Preliminary Injunction	3.40
3/31/21	SRM	Continued edits and drafting of verified complaint and related preliminary injunction filings; emails with J. Gutkoski and P. Zacharakis regarding same.	6.00
3/31/21	JTG	Revisions to draft verified complaint; attention to expedited discovery; attention to proposed orders; review and incorporate information; attention to timing issues.	9.60
3/31/21	PKZ	Email to J. Gutkoski and S. Magee regarding draft of the Memorandum of Law in Support of the Motion for Preliminary Injunction and Expedited Discovery Legal research and finish draft of Memorandum in Support of Motion for Preliminary injunction Email from/to J. Gutkoski and S. Magee regarding status on Memorandum of Law in Support of Preliminary Injunction and Expedited Discovery Edit Memorandum in Support of Motion for Preliminary Injunction and Expedited Discovery Meeting with J. Gutkoski regarding Memorandum in Support of Preliminary Injunction and Expedited Discovery Review and annotate draft of Verified Complaint	5.90
		TOTAL PROFESSIONAL SERVICES	\$ 65,354.00
		MATTER TOTAL	\$ 65,354.00
		TOTAL THIS INVOICE	\$ 73,021.50

Invoice #: 242803 April 9, 2021

OUTSTANDING INVOICES

INVOICE	DATE	INVOICE	PAYMENTS	ENDING
NUMBER		TOTAL	RECEIVED	BALANCE
229626	7/21/20	1,297.00	.00	1,297.00
240460	2/08/21	2,771.24	.00	2,771.24
241827	3/08/21	2,428.45	684.00	1,744.45

Previous Balance \$ 5,812.69

Total Due This Invoice \$ 73,021.50

TOTAL BALANCE DUE \$78,834.19

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 304 of 418



CityPoint 480 Totten Pond Road, 4th Floor Waltham, MA 02451 morse.law t -781-622-5930 f -781-622-5933 billing@morse.law

April 9, 2021

KPM Analytics, Inc. 113 Cedar Street Milford, MA 01757 Invoice #: 242803 Client #: 10255 Billing Attorney: JCM

REMITTANCE ADVICE

RE: KPM Analytics, Inc.

BALANCE DUE THIS INVOICE \$ 73,021.50

Previous Balance \$5,812.69

TOTAL BALANCE DUE \$78,834.19

Make checks payable to:

Morse

480 Totten Pond Road, 4th Floor

Waltham, MA 02451

Wire Instructions:

For domestic wire payments: Cambridge Trust

1336 Massachusetts Avenue, Cambridge MA 02138

ABA Routing # 011300595

Beneficiary Name: Morse, Barnes-Brown & Pendleton PC

Operating Acct # 0041001967

For international wire payments: Cambridge Trust

(USD denominated) SWIFT CODE CAUPUS31

ABA Routing # 011300595 Operating Acct # 0041001967

INVOICE IS PAYABLE UPON RECEIPT



Suite 1710 Boston, MA 02109 Phone: 617-570-3700

> July 29, 2022 Invoice No:

Partner John Gutkoski Cesari & McKenna LLP 1 Liberty Sq Suite 310 Boston, MA 02109

Matter 202112003270 Cesari McKenna/KPM Analytics/Blue Sun

Professional Services rendered from June 1, 2022 to June 30, 2022

Name	Level	Hours	Rate	Amount
Zoltowski, Neil	Partner	6.30	495.00	3,118.50
Boom, Michael	Manager	1.70	350.00	595.00
Total Labor		8.00		3,713.50

78,365.00

Invoice Total: \$3.713.50

Outstanding Invoices

Total

 Number
 Date
 Balance

 5/27/2022
 8,173.50

 6/23/2022
 70,191.50

********Please Note that INVOICE # HIGHLIGHTED ABOVE WAS PAID BY CESARI AND MCKENNA, LLP ON AUGUST 4, 2022 ******

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 306 of 418

Wire & ACH Payment
StoneTurn Group LLP Bank Name: JPMorgan Chase City & State: New York, New York Account #: Routing #:

Check Payments

StoneTurn Group LLP 75 State Street, Suite 1710 Boston, MA 02109

Please include your invoice number in the payment reference.

If you have any questions or concerns, please email accounting@stoneturn.com

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 307 of 418

Cesari McKenna/KPM Analytics/Blue Sun June 1, 2022 to June 30, 2022

Invoice No:

Name	Date	Description	Hours	Rate	Fees
Zoltowski, Neil	6/2/2022	Discussions; Document Review	0.50	495.00	\$ 247.50
Zoltowski, Neil	6/3/2022	Discussions; Document Review	1.20	495.00	\$ 594.00
Boom, Michael	6/3/2022	Analysis	0.70	350.00	\$ 245.00
Boom, Michael	6/6/2022	Analysis	0.50	350.00	\$ 175.00
Boom, Michael	6/7/2022	Analysis	0.50	350.00	\$ 175.00
Zoltowski, Neil	6/8/2022	Discussions; Document Review	1.40	495.00	\$ 693.00
Zoltowski, Neil	6/9/2022	Discussions; Document Review	1.90	495.00	\$ 940.50
Zoltowski, Neil	6/10/2022	Analysis; Discussions; Document Review	1.30	495.00	\$ 643.50

Total Professional Services 8.00 3.7	
Total Floressional Services 0.00 5,7	13.50



Suite 1710 Boston, MA 02109 Phone: 617-570-3700

September 22, 2022 Invoice No:

John Gutkoski, Esq. Cesari & McKenna LLP 1 Liberty Square Suite 310 Boston, MA 02109

Matter 202112003270 Cesari McKenna/KPM Analytics/Blue Sun

Professional Services rendered from August 1, 2022 to August 31, 2022

Name	Level	Hours	Rate	Amount
Zoltowski, Neil	Partner	11.80	495.00	5,841.00
Boom, Michael	Manager	3.30	350.00	1,155.00
Total Labor		15.10		6.996.00

Invoice Total: \$6,996.00

Outstanding Invoices

 Number
 Date
 Balance

 8/29/2022
 2,680.00

Total 2,680.00

Wire and ACH Payment

StoneTurn Group LLP Bank Name: JPMorgan Chase City & State: New York, New York

Account #: Routing #:

Check Payments
StoneTurn Group, LLP
75 State Street, Suite 902
Boston, MA 02109

Please include your invoice number in the payment reference.

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 309 of 418

Cesari McKenna/KPM Analytics/Blue Sun August 1, 2022 to August 31, 2022

Invoice No:

Name	Date	Description	Hours	Rate	Fe	es
Zoltowski, Neil	2022/08/04	Deposition Preparation	6.70	495.00	\$ 3,	,316.50
Zoltowski, Neil	2022/08/05	Deposition Preparation; Deposition Testimony	5.10	495.00	\$ 2,	,524.50
Boom, Michael	2022/08/04	Deposition Preparation; Document Review	3.00	350.00	\$ 1,	,050.00
Boom, Michael	2022/08/05	Deposition Preparation	0.30	350.00	\$	105.00

Total Professional Services 15.10 6,996.00

StoneTurn

75 State Street Suite 1710 Boston, MA 02109 Phone: 617-570-3700

August 29, 2022 Invoice No:

Partner John Gutkoski Cesari & McKenna LLP 1 Liberty Sq Suite 310 Boston, MA 02109

Matter 202112003270 Cesari McKenna/KPM Analytics/Blue Sun

Professional Services rendered from July 1, 2022 to July 31, 2022

Name	Level	Hours	Rate	Amount
Zoltowski, Neil	Partner	4.00	495.00	1,980.00
Boom, Michael	Manager	2.00	350.00	700.00
Total Labor		6.00		2.680.00

Invoice Total: \$2,680.00

Outstanding Invoices

 Number
 Date
 Balance

 7/27/2022
 3,713.50

Total 3,713.50

Wire and ACH Payment

StoneTurn Group LLP
Bank Name: JPMorgan Chase
City & State: New York, New York

Account #:

Routing #:

Check Payments

StoneTurn Group, LLP 75 State Street, Suite 902 Boston, MA 02109

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 311 of 418

Cesari McKenna/KPM Analytics/Blue Sun

July 1, 2022 to July 31, 2022 Invoice No: 14305

Name	Date	Description	Hours	Rate	Fees
Zoltowski, Neil	7/6/2022	Discussions; Document Review	0.70	495.00	\$ 346.50
Zoltowski, Neil	7/7/2022	Discussions; Document Review	1.20	495.00	\$ 594.00
Zoltowski, Neil	7/28/2022	Discussions; Document Review	2.10	495.00	\$ 1,039.50
Boom, Michael	7/7/2022	Discussions; Document Review	1.00	350.00	\$ 350.00
Boom, Michael	7/28/2022	Discussions; Document Review	1.00	350.00	\$ 350.00

Total Professional Services	6.00	2,680.00



Suite 1710 Boston, MA 02109 Phone: 617-570-3700

> November 30, 2022 Invoice No:

Partner John Gutkoski Cesari & McKenna LLP 1 Liberty Sq Suite 310 Boston, MA 02109

Matter 202112003270 Cesari McKenna/KPM Analytics/Blue Sun

Professional Services rendered from September 1, 2022 to October 31, 2022

Name	Level	Hours	Rate	Amount
Zoltowski, Neil	Partner	4.90	495.00	2,425.50
Boom, Michael	Manager	1.50	350.00	525.00
Total Labor		6.40		2.950.50

Invoice Total: \$2,950.50

Outstanding Invoices

Number	Date	Balance
0014230	7/29/2022	6,996.00

Total 6,996.00

Wire and ACH Payment
StoneTurn Group LLP
Bank Name: JPMorgan Chase
City & State: New York, New York

Routing #:

Account #:

<u>Check Payments</u> StoneTurn Group LLP 75 State Street, Suite 1710 Boston, MA 02109 Cesari McKenna/KPM Analytics/Blue Sun September 1, 2022 to October 31, 2022 Invoice No:

Name	Date	Description	Hours	Rate	Fees
Zoltowski, Neil	2022/09/30	Discussions; Document Review	1.10	495.00	\$ 544.50
Zoltowski, Neil	2022/10/24	Deposition Preparation; Discussions	3.30	495.00	\$ 1,633.50
Zoltowski, Neil	2022/10/25	Deposition Preparation; Discussions	0.50	495.00	\$ 247.50
Boom, Michael	2022/10/21	Document Review; Deposition Preparation	1.00	350.00	\$ 350.00
Boom, Michael	2022/10/25	Deposition Preparation.	0.50	350.00	\$ 175.00

Total Professional Services	6.40	2,950.50

StoneTurn

75 State Street Suite 1710 Boston, MA 02109 Phone: 617-570-3700

> April 30, 2023 Invoice No:

Terms:



John T. Gutkoski, Esq. Sunstein LLP 100 High Street Boston, MA 02110

Matter 202112003270 Sunstein/KPM Analytics/Blue Sun

Professional Services rendered from March 1, 2023 to March 31, 2023

Name	Level	Hours	Rate	Amount
Zoltowski, Neil	Partner	5.50	525.00	2,887.50
Boom, Michael	Manager	1.00	395.00	395.00
Total Labor		6.50		3.282.50

9,946.50

Invoice Total: \$3,282.50

Outstanding Invoices

Total

 Number
 Date
 Balance

 7/29/2022
 6,996.00

 11/30/2022
 2,950.50

Wire and ACH Payment
StoneTurn Group LLP

Bank Name: JPMorgan Chase
City & State: New York, New York
Account #:

<u>Check Payments</u> StoneTurn Group LLP 75 State Street, Suite 1710 Boston, MA 02109 Sunstein/KPM Analytics/Blue Sun March 1, 2023 to March 31, 2023

Invoice No: 15276

Name	Date	Description	Hours	Rate	Fees
Zoltowski, Neil	3/1/2023	Discussions; Document Review	1.30	525.00	\$ 682.50
Zoltowski, Neil	3/20/2023	Analysis; Discussions; Document Review	1.10	525.00	\$ 577.50
Zoltowski, Neil	3/23/2023	Discussions	0.80	525.00	\$ 420.00
Zoltowski, Neil	3/28/2023	Analysis; Discussions; Document Review	1.50	525.00	\$ 787.50
Zoltowski, Neil	3/29/2023	Analysis; Discussions; Document Review	0.80	525.00	\$ 420.00
Boom, Michael	3/1/2023	Discussions	0.50	395.00	\$ 197.50
Boom, Michael	3/17/2023	Analysis	0.50	395.00	\$ 197.50

Total Professional Services	6.50	3,282.50

StoneTurn

75 State Street Suite 1710 Boston, MA 02109 Phone: 617-570-3700

May 25, 2023

Invoice No:

Terms: Net 30

John Gutkoski, Esq. Sunstein LLP 100 High Street Boston, MA 02110-2321

Matter 202112003270 Sunstein/KPM Analytics/Blue Sun

Professional Services rendered from April 1, 2023 to April 30, 2023

Name	Level	Hours	Rate	Amount
Zoltowski, Neil	Partner	11.00	525.00	5,775.00
Boom, Michael	Manager	9.50	395.00	3,752.50
Total Labor		20.50		9.527.50

Invoice Total: \$9,527.50

Outstanding Invoices

Number	Date	Balance
	7/29/2022	6,996.00
	11/30/2022	2,950.50
	4/30/2023	3,282.50
Total		13,229.00

Wire and ACH Payment

StoneTurn Group LLP
Bank Name: JPMorgan Chase
City & State: New York, New York
Account #: Routing #:

<u>Check Payments</u> StoneTurn Group LLP 75 State Street, Suite 1710 Boston, MA 02109

Sunstein/KPM Analytics/Blue Sun April 1, 2023 to April 30, 2023

Invoice No:

Name	Date	Description	Hours	Rate	Fees
Zoltowski, Neil	4/5/2023	Trial Preparation	1.20	525.00	\$ 630.00
Zoltowski, Neil	4/6/2023	Trial Preparation	1.40	525.00	\$ 735.00
Zoltowski, Neil	4/7/2023	Trial Preparation	1.10	525.00	\$ 577.50
Zoltowski, Neil	4/24/2023	Trial Preparation	1.40	525.00	\$ 735.00
Zoltowski, Neil	4/26/2023	Trial Preparation	2.60	525.00	\$ 1,365.00
Zoltowski, Neil	4/27/2023	Trial Preparation	3.30	525.00	\$ 1,732.50
Boom, Michael	4/10/2023	Document Review.	0.50	395.00	\$ 197.50
Boom, Michael	4/21/2023	Analysis	0.50	395.00	\$ 197.50
Boom, Michael	4/24/2023	Analysis	0.50	395.00	\$ 197.50
Boom, Michael	4/26/2023	Analysis; Document Review	3.00	395.00	\$ 1,185.00
Boom, Michael	4/27/2023	Analysis	2.00	395.00	\$ 790.00
Boom, Michael	4/28/2023	Analysis	3.00	395.00	\$ 1,185.00

Total Professional Services	20.50	9,527.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 318 of 418

StoneTurn

Suite 902 Boston, MA 02109 Phone: 617-570-3700

June 23, 2022 Invoice No:

Partner John Gutkoski Cesari & McKenna LLP 1 Liberty Sq Suite 310 Boston, MA 02109

Matter 202112003270 Cesari McKenna/KPM Analytics/Blue Sun

Professional Services rendered from May 1, 2022 to May 31, 2022

Name	Level	Hours	Rate	Amount
Zoltowski, Neil	Partner	64.20	495.00	31,779.00
Boom, Michael	Manager	89.50	350.00	31,325.00
Doherty, Christina	Consultant	31.50	225.00	7,087.50
Total Labor		185.20		70,191.50

Invoice Total: \$70,191.50

Outstanding Invoices

 Nι
 Date
 Balance

 5/27/2022
 8,173.50

 Total
 8,173.50

Wire and ACH Payment
StoneTurn Group LLP
Bank Name: JPMorgan Chase
City & State: New York, New York
Account #: Routing #:

Check Payments
StoneTurn Group, LLP
75 State Street, Suite 902
Boston, MA 02109

Cesari McKenna/KPM Analytics/Blue Sun

May 1, 2022 to May 31, 2022

Invoice No:

Name	Date	Description	Hours	Rate	Fees
Zoltowski, Neil	5/9/2022	Discussions; Document Review	1.40	495.00	\$ 693.00
Zoltowski, Neil	5/10/2022	Analysis; Discussions; Document Review	2.70	495.00	\$ 1,336.50
Zoltowski, Neil	5/11/2022	Analysis; Discussions; Document Review: Report Preparation	1.30	495.00	\$ 643.50
Zoltowski, Neil		Analysis; Discussions; Document Review: Report Preparation	4.10	495.00	\$ 2,029.50
Zoltowski, Neil	5/13/2022	Discussions; Report Preparation	5.30	495.00	\$ 2,623.50
Zoltowski, Neil	5/14/2022	Document Review; Report Preparation	4.60	495.00	\$ 2,277.00
Zoltowski, Neil	5/16/2022	Discussions; Report Preparation	6.20	495.00	\$ 3,069.00
Zoltowski, Neil	5/17/2022	Analysis; Discussions; Report Preparation	4.70	495.00	\$ 2,326.50
Zoltowski, Neil	5/18/2022	Analysis; Discussions; Report Exhibits; Report Preparation	5.50	495.00	\$ 2,722.50
Zoltowski, Neil	5/19/2022	Discussions; Report Preparation	4.10	495.00	\$ 2,029.50
Zoltowski, Neil		Discussions; Report Preparation	6.00	495.00	\$ 2,970.00
Zoltowski, Neil	5/21/2022	Discussions; Report Preparation	3.30	495.00	\$ 1,633.50
Zoltowski, Neil	5/22/2022	Report Exhibits; Report Preparation	5.20	495.00	\$ 2,574.00
Zoltowski, Neil	5/23/2022	Report Exhibits; Report Preparation	9.80	495.00	\$ 4,851.00
Boom, Michael	5/2/2022	Document Review	2.00	350.00	\$ 700.00
Boom, Michael	5/6/2022	Report Preparation	5.00	350.00	\$ 1,750.00
Boom, Michael	5/9/2022	Document Review; Report Preparation	6.00	350.00	\$ 2,100.00
Boom, Michael	5/10/2022	Report Preparation	7.00	350.00	\$ 2,450.00
Boom, Michael	5/11/2022	Report Preparation	7.00	350.00	\$ 2,450.00
Boom, Michael	5/12/2022	Report Preparation	7.00	350.00	\$ 2,450.00
Boom, Michael	5/13/2022	Analysis; Discussions; Report Preparation	4.00	350.00	\$ 1,400.00
Boom, Michael	5/15/2022	Analysis	3.50	350.00	\$ 1,225.00
Boom, Michael	5/16/2022	Analysis; Document Review	6.00	350.00	\$ 2,100.00
Boom, Michael	5/17/2022	Analysis; Document Review	5.00	350.00	\$ 1,750.00
Boom, Michael		Analysis; Report Preparation	7.00	350.00	\$ 2,450.00
Boom, Michael	5/19/2022	Analysis; Report Preparation	7.00	350.00	\$ 2,450.00
Boom, Michael	5/20/2022	Analysis; Report Preparation	6.00	350.00	\$ 2,100.00
Boom, Michael	5/21/2022	Analysis; Report Preparation	2.50	350.00	\$ 875.00
Boom, Michael	5/22/2022		2.50	350.00	\$ 875.00
Boom, Michael	5/23/2022	Analysis; Report Preparation.	10.00	350.00	\$ 3,500.00
Boom, Michael	5/27/2022	Report Preparation	2.00	350.00	\$ 700.00
Doherty, Christina	5/19/2022	Report Exhibits; Report Preparation	6.50	225.00	\$ 1,462.50
Doherty, Christina	5/20/2022	Report Exhibits; Report Preparation	9.00	225.00	\$ 2,025.00
Doherty, Christina	5/23/2022	Report Exhibits; Report Preparation	7.00	225.00	\$ 1,575.00
Doherty, Christina		Report Exhibits; Report Preparation	4.00	225.00	\$ 900.00
Doherty, Christina	5/27/2022	Report Exhibits; Report Preparation	5.00	225.00	\$ 1,125.00

Total Professional Services 185.20 70,191.50



March 13, 2023

Client Number: 05016 Invoice Number: 366378

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Total Invoice Amount	\$52,404.94
Less Credits and Trust To Be Applied to Invoice	-\$0.00
Total Due This Invoice	\$52,404.94



Client Name: KPM Analytics North America Corporation

Client Number: 05016

March 13, 2023

Invoice Number - 366378

Page 2 of 4

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Current Invoice Summary

	Total Due this Invoice	\$52,394.50	\$10.44	\$0.00	\$52,404.94
Totals for I	Litigation Matters	52,394.50	10.44	0.00	52,404.94
Litigation N 05001	Matters v. Blue Sun Scientific,	52,394.50	10.44	0.00	52,404.94
Matter	Name	<u>Fees</u>	<u>Expenses</u>	Credits <u>Applied</u>	Total Due



Client Name: KPM Analytics North America Corporation

Client Number: 05016

March 13, 2023

Invoice Number - 366378

Page 3 of 4

RE: 05001-v. Blue Sun Scientific, LLC et al

Fees

Date		Description of Services	Hrs.	Amount
02/06/23	JTG	Notice from Court on hearing date; distribute to team and client; related correspondence.	2.20	1,485.00
02/08/23	JTG	Team correspondence; review exhibits and arguments for hearing.	6.60	4,455.00
02/09/23	JTG	Review cases and briefs; hearing preparation.	5.90	3,982.50
02/10/23	JTG	Prepare for hearing on both motions.	8.30	5,602.50
02/11/23	JTG	Hearing preparation.	5.20	3,510.00
02/13/23	JTG	Prepare for hearing.	10.40	7,020.00
02/14/23	JTG	Final preparation for and conduct hearing on motions for summary judgment and to dissolve injunction; follow up discussions with client and team.	6.90	4,657.50
02/16/23	JTG	Receive, review and report motions order to client and team.	3.10	2,092.50
02/17/23	JTG	Receive and review trial order and pretrial deadlines; calendar and begin outlining needs; team correspondence.	4.50	3,037.50
02/20/23	JTG	Attention to witness issues and strategy.	3.60	2,430.00
02/23/23	JTG	Attention to witness options and strategy; review docket and record; team correspondence.	5.10	3,442.50
02/24/23	JTG	Trial strategy and pretrial schedule planning.	3.30	2,227.50
02/27/23	JTG	Attention to exhibits and transcripts; address questions regarding Lucas and the admissibility of his plea and sentencing.	4.30	2,902.50
02/27/23	KWS	Conduct legal research and analysis regarding evidence of Mr. Lucas's fraud and plea in prior proceeding	0.50	252.50
02/28/23	JTG	Correspondence from opposing counsel regarding their looking to move trial and extend its length; related correspondence with team and client; attention to schedule and case data.	6.80	4,590.00
02/28/23	KWS	Conduct investigation regarding status of sentencing hearing of Mr. Lucas and regarding sentencing of in fraud case; conduct legal research and analysis regarding reliance on evidence of past fraud in current litigation	1.40	707.00
		Total Fees Billed		\$52,394.50



Client Name: KPM Analytics North America Corporation

Client Number: 05016

March 13, 2023

Invoice Number - 366378

Page 4 of 4

Summary of Services

Professional		Base Rate	Hours	Amount
Attorneys JTG KWS	John T Gutkoski Katherine W. Soule	675.00 505.00	76.20 1.90	\$51,435.00 \$959.50

Expenses

Description of Expense Printing	<u>Amount</u> 10.44
Total Expenses Billed	\$10.44

Total Current Billings on Matter

\$52,404.94



April 21, 2023

Client Number: 05016 Invoice Number: 367016

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Total Invoice Amount
Less Credits and Trust To Be Applied to Invoice

Total Due This Invoice

\$103,063.47

\$103,063.47



Client Name: KPM Analytics North America Corporation

Client Number: 05016

April 21, 2023

Invoice Number - 367016

Page 2 of 7

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Current Invoice Summary

	Total Due this Invoice	\$102,220.00	\$843.47	\$0.00	\$103,063.47
Totals for I	itigation Matters	102,220.00	843.47	0.00	103,063.47
Litigation N 05001	Matters v. Blue Sun Scientific,	102,220.00	843.47	0.00	103,063.47
Matter	Name	<u>Fees</u>	Expenses	Credits <u>Applied</u>	Total Due



Client Name: KPM Analytics North America Corporation
Client Number: 05016

April 21, 2023

Invoice Number - 367016
Page 3 of 7

RE: 05001-v. Blue Sun Scientific, LLC et al

Fees

Date		<u>Description of Services</u>	Hrs.	Amount
03/01/23	JTG	Attention to trial logistics; attention to damages expert reports; meeting with experts and K. Mosier regarding updates to reports, needed materials and adjustments for trial.	8.80	5,940.00
03/01/23	KRM	Strategy and correspondence concerning trial and exhibits for trial; review and analyze deposition exhibits; correspondence with trial team and opposing counsel concerning trial schedule; review and analyze expert reports; meet with Mr. Zoltowski concerning damages and expert reports	4.30	2,171.50
03/01/23	SWR	Review deposition files; coordinate assembly of all relevant documents and request credentials for team	1.70	527.00
03/01/23	SWR	Review and organize deposition transcripts and exhibits; correspondence regarding file transfer	2.30	713.00
03/02/23	JTG	Prepare for and call with opposing counsel and tea; team call; attention to trial date options; messages with client; attention to trial and exhibit issues.	9.40	6,345.00
03/02/23	KRM	Call with opposing counsel to discuss trial schedule; review and analyze depositions and exhibits to same	3.50	1,767.50
03/02/23	SWR	Review pleadings and deposition exhibits received to date	0.50	155.00
03/03/23	JTG	Team meeting regarding testimony, evidentiary issues, and exhibts; begin reviewing depositions and testimony and exhibits.	6.70	4,522.50
03/03/23	KRM	Develop strategy for trial; review depositions and exhibits to same for trial evidence	1.50	757.50
03/03/23	SWR	Review deposition transcripts and exhibits; review document database and join meeting	0.90	279.00
03/04/23	JTG	Review of transcripts and exhibits.	5.60	3,780.00
03/06/23	JTG	Review of transcripts and exhibit evidence.	5.40	3,645.00
03/07/23	SWR	Create link to deposition exhibits and transcripts files	0.30	93.00
03/08/23	JTG	Continue review of transcripts and discovery evidence.	6.10	4,117.50
03/08/23	KRM	Develop strategy for jury instructions and trial logistics	2.00	1,010.00
03/08/23	SWR	Review pretrial order	0.50	155.00
03/09/23	SWR	Coordinate secure Internet access for trial; review listing of deposition exhibits	1.00	310.00



	Client Name: KPM Analytics North America Corporation Client Number: 05016 April 21, 2023		Invoic	e Number - 367016 Page 4 of 7
<u>Date</u>		Description of Services	Hrs.	Amount
03/10/23	JTG	Continue review of discovery record and evidence.	6.30	4,252.50
03/10/23	KRM	Develop strategy for trial logistics and search for trial hot seat operator; correspondence with damages expert concerning supplementation of opinions	1.00	505.00
03/10/23	SWR	Correspondence regarding trial technician	0.70	217.00
03/13/23	JTG	Attention to Court orders on various legal issues in the case; continue work on discovery record and evidence.	6.70	4,522.50
03/13/23	KRM	Search for trial hot seat operator and correspondence concerning same; correspondence concerning damages expert opinions and trial logistics; draft jury instructions	2.70	1,363.50
03/13/23	SWR	Correspondence regarding trial presentation vendors; review status and completeness of downloaded documents	0.80	248.00
03/14/23	SWR	Review and organize deposition transcripts and exhibits	0.40	124.00
03/15/23	JTG	Continue work on testimony and witness statements.	5.50	3,712.50
03/16/23	JTG	Receipt of Court Orders regarding reassignment of Judge and calendar changes; team discussions, attention to logistics for Worcester Court House change, notify experts.	3.60	2,430.00
03/16/23	KRM	Review and analyze court order re-assigning the case to Judge Guzman in Worcester; call with court clerk to discuss same and trial schedule; research case strategy; discuss trial logistics and develop strategy for same	3.70	1,868.50
03/16/23	SWR	Review logistics regarding transfer to Worcester	0.20	62.00
03/17/23	JTG	Messages with client regarding Court and Judge change; attention to motions in limine and pretrial materials	6.30	4,252.50
03/17/23	SWR	Investigation regarding logistics for Worcester trial	2.70	837.00
03/20/23	KRM	Review order setting status conference and correspondence concerning same; correspondence concerning hot seat operators for trial	0.70	353.50
03/23/23	JTG	Attention to case; prepare for and meeting with expert; team discussions; review related exhibits.	5.70	3,847.50
03/23/23	KRM	Correspondence concerning supplementation of damages opinions; meeting with experts concerning same	0.50	252.50
03/23/23	SWR	Review logistics for trial; follow up regarding secure Internet access for courtroom during trial	0.90	279.00
03/26/23	KWS	Conduct legal research and analysis regarding introduction of prior bad acts at trial	1.60	808.00
03/28/23	JTG	Prepare for and lead Zoom Conference Call with Judge; update to clients; follow up team meeting; strategy planning; attention to	9.90	6,682.50



1	ame: KPN umber: 05	M Analytics North America Corporation 6016 April 21, 2023	Invoic	e Number - 367016 Page 5 of 7
<u>Date</u>		Description of Services	Hrs.	Amount
		logistical changes; attention to pretrial events calendar changes.		
03/28/23	KRM	Correspondence concerning status conference; attend status conference; review proposed case schedule and identify conflicts and inconsistencies with same; propose changes to same; research and correspondence concerning hot seat operator, hotel and working space accommodations, and vendors necessary for trial; develop strategy for pre-trial work allocation; review orders and materials for use in trial	4.40	2,222.00
03/28/23	SWR	Contact area hotels regarding availability of rooms and conference space for the duration of trial	1.70	527.00
03/29/23	JTG	Attention to new schedule and deadlines; develop new strategy and timing; attention to information on logistics options and costs; attention to exhibits and witnesses.	9.10	6,142.50
03/29/23	KRM	Correspondence with damages experts and review of files relating to same; develop strategy concerning witnesses and deposition designations; correspondence concerning hotel accommodations, working space, and printing needs for trial	3.20	1,616.00
03/29/23	SWR	Review database for deposition errata sheets and signature pages; coordinate logistics for work room, hotel, transport and equipment rental for trial	3.40	1,054.00
03/30/23	JTG	Work with exhibits and designations; attention to logistics options and budget proposals; attention to courthouse and related location options.	8.20	5,535.00
03/30/23	KRM	Develop strategy concerning witnesses and deposition designations; review deposition summaries correspondence concerning hotel accommodations, working space, and printing needs for trial; correspondence with damages experts concerning; discuss research	3.10	1,565.50
03/30/23	SWR	Investigation regarding meet with court staff to discuss trial logistics; meet with hotel staff to review space and to coordinate logistics for setting up work room	6.70	2,077.00
03/31/23	JTG	Attention to witnesses, transcripts and exhibits; prepare for and conduct team meeting; review designations from team; prepare and send proposal to opposing counsel regarding adjustments to schedule and supplementation of financial information; messages with client.	9.30	6,277.50
03/31/23	KRM	Develop trial and witness strategy; develop strategy for identifying and admitting exhibits at trial; correspondence concerning trial logistics, including hotel accommodations, working space, trial hot seat operators, and printing needs; develop strategy concerning trial brief and joint pre-trial memorandum; correspondence with opposing counsel concerning pre-trial schedule; correspondence with damages expert concerning supplementation of damages opinions	1.80	909.00



Client Na		Invoi	Invoice Number - 367016 Page 6 of 7		
		Description of Services April 21, 2023	Hrs.	Amount	
03/31/23 03/31/23	KWS SWR	Develop strategy regarding trial logistics Coordinate logistics for trial regarding work space and rooms at hotel,	0.60 3.50	303.00 1,085.00	
		equipment rental, and court; coordinate secure Internet access during trial		0102 220 00	
		Total Fees Billed		\$102,220.00	

Summary of Services

		Base		
Professional		Rate	Hours	Amount
Attorneys				
JTG	John T Gutkoski	675.00	112.60	\$76,005.00
KRM	Kevin R. Mosier	505.00	32.40	\$16,362.00
KWS	Katherine W. Soule	505.00	2.20	\$1,111.00
Paralegals SWR	Steven W. Ramsdell	310.00	28.20	\$8,742.00

Expenses

<u>Description of Expense</u>	<u>Amount</u>
Computer Research	514.15
Electronic Discovery Vendor	250.00
Printing	79.32
Total Expenses Billed	\$843.47

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 330 of 418



Winning Intellectual Property®

Client Name: KPM Analytics North America Corporation

Client Number: 05016

April 21, 2023

Invoice Number - 367016

Page 7 of 7

Total Current Billings on Matter

\$103,063.47



May 25, 2023

Client Number: 05016 Invoice Number: 367658

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Total Invoice Amount

Less Credits and Trust To Be Applied to Invoice

Total Due This Invoice

\$319,696.73

\$319,696.73



Client Name: KPM Analytics North America Corporation

Client Number: 05016

May 25, 2023

Invoice Number - 367658

Page 2 of 11

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Current Invoice Summary

	Total Due this Invoice	\$300,113.50	\$19,583.23	\$0.00	\$319,696.73
Totals for Li	tigation Matters	300,113.50	19,583.23	0.00	319,696.73
Litigation M 05001	atters v. Blue Sun Scientific,	300,113.50	19,583.23	0.00	319,696.73
Matter	Name	Fees	<u>Expenses</u>	Credits <u>Applied</u>	<u>Total Due</u>



Client Name: KPM Analytics North America Corporation

Client Number: 05016

May 25, 2023

Invoice Number - 367658

Page 3 of 11

RE: 05001-v. Blue Sun Scientific, LLC et al

Fees

Date		Description of Services	Hrs.	Amount
04/02/23	JTG	Develop trial strategy.	6.40	4,320.00
04/03/23	JTG	Witness and exhibit work; attention to pretrial legal issues.	6.80	4,590.00
04/03/23	KRM	Review and discuss options for hotel accommodations, working space, printing needs, and logistical matters relating to trial; correspondence concerning same; develop strategy for pre-trial tasks and division of labor; correspondence concerning trial witness strategy and testimony; draft trial brief	3.50	1,767.50
04/03/23	KWS	Conduct legal investigation and analysis regarding trial	0.30	151.50
04/03/23	SWR	Review logistics for trial; review pretrial assignments regarding exhibits	2.10	651.00
04/04/23	JTG	Attention to witness deposition testimonies and related exhibits; pretrial strategy and team discussion.	7.50	5,062.50
04/04/23	KRM	Review and discuss options and costs for hot seat operator, trial graphics, and logistical matters relating to trial; correspondence concerning same; develop strategy for exchange of exhibit lists and deposition designations, objections to exhibits and deposition testimony, and counter-designations of deposition testimony; develop trial witness strategy and order of witnesses; research and correspondence concerning propriety of compensating fact witnesses; draft jury instructions and trial brief	3.70	1,868.50
04/04/23	KWS	Develop strategy regarding trial logistics, pretrial deadlines, and legal research	0.90	454.50
04/04/23	SWR	Review logistics and cost projections for upcoming trial; review pretrial assignments	2.10	651.00
04/05/23	JTG	Prepare for and call with E. Olson; work with exhibits; attention to pretrial legal issues.	7.20	4,860.00
04/05/23	KWS	Conduct legal research and analysis regarding live testimony	0.40	202.00
04/05/23	SWR	Correspondence with courtroom clerk regarding electronic equipment; review computer hardware required for work room; coordinate wireless Internet connectivity for courtroom; review correspondence from opposing counsel	3.10	961.00
04/06/23	JTG	Develop trial themes and related testimony; prepare for and lead team call; attention to exhibit issues.	6.80	4,590.00



	ame: KPN umber: 0:	M Analytics North America Corporation 5016 May 25, 2023	Invoice	e Number - 367658 Page 4 of 11
<u>Date</u>		<u>Description of Services</u>	Hrs.	<u>Amount</u>
04/06/23	KRM	Draft trial brief and jury instructions; draft joint motion to extend pre- trial deadlines; develop strategy concerning trial witnesses and exhibit lists; correspondence concerning damages supplementation; correspondence with opposing counsel concerning trial witnesses, deposition designations, and presentation of confidential documents at trial; coordinate procurement of necessary equipment for trial team; correspondence with trial hot seat operator concerning trial schedule	7.50	3,787.50
04/06/23	SWR	Review document database; correspondence with Target Litigation Consulting locate specific documents for team members	3.10	961.00
04/07/23	JTG	Exhibit list generation; multiple messages with team and client; assemble materials; emails to opposing counsel.	12.80	8,640.00
04/07/23	KRM	Draft jury instructions and voir dire questions; research and analyze case law relating to same; develop strategy concerning trial witnesses and exhibit lists; correspondence with opposing counsel concerning trial witnesses and deposition designations	5.20	2,626.00
04/07/23	KWS	Conduct legal research and analysis regarding FRE 609 and impeachment	2.30	1,161.50
04/07/23	SWR	Locate and download native versions of deposition exhibits for review	0.70	217.00
04/08/23	JTG	Continue to assemble trial exhibit list adding exhibits from record of pleadings and filings throughout the case; related team emails on exhibits, depositions and evidentiary issues.	9.20	6,210.00
04/09/23	JTG	Attention to exhibits; attention to likely order of witnesses.	5.60	3,780.00
04/10/23	JSS	Review and analyze rules of hearsay; review and analyze Exhibit review and analyze Exhibit; discuss case with Mr. Gutkoski in order to create strategy	0.80	348.00
04/10/23	JTG	Finalize and submit initial pretrial filings and lists; study lists from defendants; attention to customer communications and hearsay issues.	7.40	4,995.00
04/10/23	KRM	Develop strategy for trial witnesses and exhibit list; correspondence with hot seat operator concerning case schedule; review discovery responses ; correspondence with damages experts concerning ; review and analyze defendants' exhibit lists, trial witness disclosures, and deposition designations; draft voir dire questions and verdict form	4.30	2,171.50
04/10/23	KRM	Correspondence with opposing counsel concerning request for extension of time to file opening brief and assent to same	0.30	151.50
04/10/23	SWR	Review trial exhibit list and assemble digital copies of prospective trial exhibits for review	6.30	1,953.00
04/11/23	BDH	Develop strategy on overcoming hearsay objections to trial exhibits	0.60	363.00



	ame: KPM umber: 05	I Analytics North America Corporation 016 May 25, 2023	Invoic	e Number - 367658 Page 5 of 11
<u>Date</u>		<u>Description of Services</u>	Hrs.	<u>Amount</u>
04/11/23	JSS	Research evidence	2.30	1,000.50
04/11/23	JTG	Pretrial witness work.	5.70	3,847.50
04/11/23	KRM	Draft voir dire questions and verdict form; draft trial brief; develop strategy for objections to trial witnesses and exhibit list; correspondence with opposing counsel concerning amendment to pretrial deadlines; review defendants' proposed trial exhibits; draft combined trial exhibit list; research, analyze, and develop strategy concerning exhibits exhibits develop strategy for motions in limine	7.90	3,989.50
04/11/23	SWR	Review and organize documents cited as potential trial exhibits	6.30	1,953.00
04/12/23	JSS	Research hearsay exceptions in order to admit emails to the defendant into evidence	3.70	1,609.50
04/12/23	JTG	Prepare for and call with review transcripts of former employees; ; attention to defendants' deposition designations and exhibits listed.	6.70	4,522.50
04/12/23	KRM	Draft jury instructions; draft trial brief; draft motion to amend pre-trial deadlines and proposed order entering same; review order granting motion in-part and setting new pre-trial deadlines; draft combined trial exhibit list; review defendants' proposed trial exhibits; develop strategy for motions in limine	7.60	3,838.00
04/12/23	SWR	Locate and organize documents identified as trial exhibits	7.40	2,294.00
04/13/23	JSS	Research evidence	4.40	1,914.00
04/13/23	JTG	Trial Preparation; team communications and discussions; attention to legal research on various exhibit issues.	4.80	3,240.00
04/13/23	KRM	Draft jury instructions; draft trial brief; draft combined trial exhibit list; correspondence with court clerk and opposing counsel concerning combined trial exhibit list; review defendants' proposed trial exhibits; research and develop strategy for motions in limine	8.20	4,141.00
04/13/23	SWR	Review and edit trial exhibit list; circulate all sets of trial exhibits to team	8.10	2,511.00
04/14/23	JTG	Prepare for and participate in call regarding attention to exhibits and trial preparation.	8.30	5,602.50
04/14/23	KRM	Draft pre-trial memorandum; research, analyze and develop strategy for same; draft motions in limine; research, analyze and develop strategy for same	3.70	1,868.50
04/14/23	SWR	Review and organize trial exhibits; update trial exhibit list	8.30	2,573.00
04/15/23	JTG	Review depositions and work on outlines	7.10	4,792.50



	Client Name: KPM Analytics North America Corporation Client Number: 05016 May 25, 2023			e Number - 367658 Page 6 of 11
<u>Date</u>		Description of Services	Hrs.	<u>Amount</u>
04/16/23	JTG	Trial preparation; review our planned objections; attention to witness testimony.	4.30	2,902.50
04/17/23	JTG	Final review of exhibits, designations and related objections; team communications; trial preparation.	9.20	6,210.00
04/17/23	KRM	Develop strategy concerning objections to defendants' proposed exhibits and deposition designations; correspondence concerning same; draft disclosures of objections to proposed evidence and counter-designations; correspondence with opposing counsel concerning meet and confer; draft pre-trial memorandum; research, analyze and develop strategy for same; draft motions in limine; research, analyze and develop strategy for same	7.40	3,737.00
04/17/23	KWS	Review correspondence regarding various pre-trial and trial details and strategies	0.30	151.50
04/17/23	SWR	Review and organize trial exhibits; edit exhibit list; review objections to exhibits	8.60	2,666.00
04/18/23	BDH	Develop strategy for including deposition designations in the pre-trial memorandum	0.20	121.00
04/18/23	JSS	Review defendants' objections to evidence; prepare notes regarding objections to exhibits; review and analyze exhibits that were objected to by defendants; review and analyze complaint and pleadings	3.60	1,566.00
04/18/23	JTG	Prepare for and call with continue work on witness outlines; attention to order of witnesses; review objections filed by defendants; attention to planned motions in limine; attention to damages updates.	8.90	6,007.50
04/18/23	KRM	Review and analyze defendants' objections to proposed exhibits and deposition designations; develop strategy for asserting and potentially resolving parties' respective objections to evidence; draft pre-trial memorandum; research, analyze and develop strategy for same; draft motions in limine; research, analyze and develop strategy for same; correspondence concerning necessary trial equipment and vendors	7.70	3,888.50
04/18/23	KWS	Conduct legal research and analysis regarding exclusion of evidence	2.40	1,212.00
04/18/23	SWR	Review and edit trial exhibit list; confirm hotel reservations, retention of trial equipment operator, and rental of equipment for work room	5.60	1,736.00
04/19/23	JTG	Trial preparation; prepare for and call with team and develop work tasks and deadlines; attention to evidentiary issues.	8.50	5,737.50
04/19/23	KRM	Research, analyze, and develop strategy concerning motions in limine; draft same; develop strategy concerning meet and confer with opposing counsel to discuss trial issues; develop strategy concerning trial witnesses and exhibits to be used with same	7.50	3,787.50
04/19/23	SWR	Coordinate logistics for work room and for Internet connection in courtroom; coordinate marking and pagination of Plaintiff's trial	5.70	1,767.00



	ame: KPN umber: 0:	M Analytics North America Corporation 5016 May 25, 2023	Invoic	e Number - 367658 Page 7 of 11
<u>Date</u>		Description of Services	Hrs.	Amount
		exhibits		
04/20/23	JTG	Prepare for and call with client; prepare for and conference with opposing counsel; attention to trial brief and pretrial filings; attention to evidentiary issues.	9.10	6,142.50
04/20/23	KRM	Meet and confer with opposing counsel concerning trial issues and joint pre-trial memorandum; research, analyze, and develop strategy for motions in limine; draft same; develop strategy for oppositions to the defendants' motions in limine	7.10	3,585.50
04/20/23	KWS	Conduct legal research and analysis regarding exclusion of evidence of other litigation	1.10	555.50
04/20/23	SWR	Organize and re-name exhibits for submission to the Court; coordinate logistics regarding hotel work room	7.70	2,387.00
04/21/23	BDH	Develop strategy for drafting section of pre-trial memorandum on factual and legal issues in dispute	0.20	121.00
04/21/23	JTG	Attention to witness outlines, exhibit issues, and available proof; attention to damages update issues.	10.60	7,155.00
04/21/23	KRM	Research, analyze, and develop strategy for pre-trial memorandum; draft same; coordinate exchange of pre-trial memorandum with opposing counsel; review and analyze defendants' sections of pre-trial memorandum;	7.20	3,636.00
04/21/23	KWS	Review draft pretrial memorandum, draft jury instructions, and draft trial brief	1.20	606.00
04/22/23	JTG	Trial preparation.	8.20	5,535.00
04/23/23	JTG	Attention to pretrial filings; attention to exhibits and objection issues; comments on and revisions to drafts.	6.20	4,185.00
04/23/23	KRM	Research, analyze, and develop strategy for pre-trial memorandum; draft same; research, analyze, and develop strategy for trial brief, jury instructions, verdict form, and voir dire questions; review and analyze defendants' statement of facts to be proven at trial; research, analyze, and develop strategy for objections to evidence	8.20	4,141.00
04/24/23	BDH	Develop strategy on admitting statements of party opponent through deposition testimony	0.10	60.50
04/24/23	JSS	Conference regarding motions in limine and pre-trial memorandum; review portions of deposition transcript ; communicate with Mr. Harrison regarding hearsay	1.00	435.00
04/24/23	JTG	Finalize pretrial filings; multiple strategy discussions; prepare for and conduct settlement conference with client and opposing counsel and parties; follow up with team.	10.90	7,357.50



	ame: KPN umber: 0:	M Analytics North America Corporation 5016 May 25, 2023	Invoic	e Number - 367658 Page 8 of 11
Date	<u> </u>	<u>Description of Services</u>	Hrs.	Amount
04/24/23	KRM	Develop strategy for pre-trial memorandum; draft same; correspondence with opposing counsel concerning same; develop strategy for responses to objections to evidence and draft same; review and analyze opposing counsel edits to pre-trial memorandum and defendants' responses to objections to evidence; develop strategy for trial brief, jury instructions, verdict form, and voir dire questions; draft same; correspondence concerning damages and settlement conference	8.20	4,141.00
04/24/23	KWS	Develop strategy regarding pre-trial filings	0.50	252.50
04/24/23	SWR	Coordinate logistics for hotel work room; coordinate upload and organization of trial exhibits in database; coordinate creation of multiple sets of hard copies for use in trial prep; rename set of exhibits for submission to Court's JERS system	8.60	2,666.00
04/25/23	JSS	Research tortious interference and draft jury instructions	1.60	696.00
04/25/23	JTG	Revise and work with team to finalize motions in limine, instructions, objections and trial brief; attention to legal issues; review motions from defendants and develop response strategy.	13.10	8,842.50
04/25/23	KRM	Research and develop strategy for trial brief, jury instructions, verdict form, voir dire questions, and motions in limine; draft, finalize, and file same; review and analyze the defendants' trial brief, jury instructions, voir dire questions, and motions in limine; research, analyze, and develop strategy for oppositions to the defendants' motions in limine	8.70	4,393.50
04/25/23	KWS	Review Blue Sun's motions in limine; develop strategy regarding response to motion in limine no. 6	0.70	353.50
04/25/23	SWR	Coordinate permission from Court for hot seat operator to bring in electronic gear; review and organize hard copies of trial exhibits and deposition transcripts; create binder containing deposition transcripts and mark designated portions of same; assist with exhibits to trial brief; assemble computer hardware for hotel work room	7.60	2,356.00
04/26/23	BDH	Research damages from the jury in connection with opposition to motion in limine	1.00	605.00
04/26/23	JSS	Review motions in limine from Blue Sun Scientific; review case law that Defendants rely on in their motions in limine; communicate with Mr. Gutkoski with regards to evidence in case ; prepare opposition to motion in limine regarding customer confusion; review motion in limine regarding precluding certain damages testimony; research motions in limine	7.40	3,219.00
04/26/23	JTG	Work on witness outlines and draft Opening Statement; attention to motion oppositions; attention to defendants' likely trial strategy.	8.60	5,805.00
04/26/23	KRM	Research, analyze, and develop strategy for oppositions to the	12.20	6,161.00



	ame: KPN umber: 0:	M Analytics North America Corporation 5016 May 25, 2023	Invoic	e Number - 367658 Page 9 of 11
<u>Date</u>		Description of Services	Hrs.	<u>Amount</u>
		defendants' motions in limine; draft same; review and analyze the defendants' trial brief, jury instructions, and voir dire questions; correspondence with court clerk concerning need to re-file motions in limine; coordinate re-filing of same; develop strategy for final jury instructions; correspondence with experts concerning the defendants' supplementation of financial information		
04/26/23	KWS	Analyze Blue Sun's motion in limine regarding Mr. Lucas's criminal proceeding; conduct legal research and analysis; prepare opposition to Blue Sun's motion in limine	2.30	1,161.50
04/26/23	SWR	Review and edit collection of hard copies marked up with deposition designations; send defendant's exhibits to hot seat operator; coordinate creation of disks in JERS format for the Court; review and organize key Orders regarding injunction, summary judgment, and discovery issues	8.20	2,542.00
04/27/23	BDH	Research case law on post-injunction breaches and jury trials	1.40	847.00
04/27/23	JSS	Research challenges on a motion in limine draft motion in limine regarding hearsay and speculative evidence; review motion in limine regarding damages testimony	2.10	913.50
04/27/23	JTG	Revise and finalize motions in limine oppositions and additional pretrial conference matters; prepare for and conduct zoom call with Jury Consultant; work on Opening.	11.30	7,627.50
04/27/23	KRM	Research, analyze, and develop strategy for oppositions to the defendants' motions in limine; draft same; finalize and file same; correspondence with experts ; review and analyze defendants' oppositions to KPM's motions in limine	9.70	4,898.50
04/27/23	KWS	Conduct legal research and analysis regarding Rule 609; analyze cases regarding admission of Mr. Lucas's fraud indictment and plea agreement cited by defendants; prepare opposition to defendants' motion in limine to preclude evidence of Mr. Lucas's fraud indictment and plea agreement; review oppositions to defendants' other motions in limine; conduct legal research and analysis regarding	4.80	2,424.00
04/27/23	SWR	Circulate updated trial exhibits and update hard copy sets with same; review and edit listing of exhibits and exhibits for JERS; coordinate logistics regarding lodging and food for team	5.90	1,829.00
04/28/23	JSS	Communicate with Mr. Mosier regarding jury selection	0.20	87.00
04/28/23	JTG	Prepare for Pretrial Conference; organize motion in limine arguments; travel to and from Court; team strategy meetings; conduct pretrial conference; discussions with opposing counsel; attention to logistics.	12.70	8,572.50
04/28/23	KRM	Develop strategy and prepare for final pre-trial conference; attend final pre-trial conference; travel to and from final pre-trial conference;	9.70	4,898.50



Client Na	ame: KPM	Analytics North America Corporation	Invo	ice Number - 367658
Client Number: 05016 May 25, 2023				Page 10 of 11
Date		Description of Services	Hrs.	<u>Amount</u>
		develop strategy for trial witnesses and evidence in view of court's ruling and preferences expressed at pre-trial conference		
04/28/23	KWS	Conduct legal research and analysis regarding various damages issues,	4.60	2,323.00
04/28/23	SWR	Prepare JERS disk and duplicate copy for Clerk and Transcriptionist; review and organize trial exhibits; attend final pretrial conference	7.50	2,325.00
04/29/23	JTG	Trial preparation; call with E. Olson; emails with team.	11.40	7,695.00
04/30/23	JTG	Trial preparation; develop witness outlines; revise Opening Statement.	9.90	6,682.50
04/30/23	KRM	Develop strategy for trial exhibits and witnesses; coordinate transfer of trial exhibits to court; correspondence with trial technician concerning updated trial schedule; correspondence with court concerning jury instructions and proposed statement identifying counsel and parties to be read to the jury during empanelment	2.40	1,212.00
		Total Fees Billed	-	\$300,113.50

Summary of Services

		Base		
Professional		Rate	Hours	Amount
Attorneys				
JTG	John T Gutkoski	675.00	245.20	\$165,510.00
BDH	Bryan D Harrison	605.00	3.50	\$2,117.50
KRM	Kevin R. Mosier	505.00	147.90	\$74,689.50
JSS	Jacqueline S. Salwa	435.00	27.10	\$11,788.50
KWS	Katherine W. Soule	505.00	21.80	\$11,009.00
Paralegals				
SWR	Steven W. Ramsdell	310.00	112.90	\$34,999.00



Client Name: KPM Analytics No.	rth America Corporation	Invoice Number - 367658
Client Number: 05016	May 25, 2023	Page 11 of 11

Expenses

Description of Expense	<u>Amount</u>
Computer Research	514.15
Photocopies, Outside Services	7,357.67
Shipping via Fedex, DHL, or other commercial carrier	788.44
Translation Services	10,645.65
Printing	277.32
Total Expenses Billed	\$19,583.23

Total Current Billings on Matter

\$319,696.73



June 15, 2023

Client Number: 05016 Invoice Number: 368059

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Total Invoice Amount
Less Credits and Trust To Be Applied to Invoice

Total Due This Invoice

\$366,919.37

\$366,919.37



Client Name: KPM Analytics North America Corporation

Client Number: 05016

Invoice Number - 368059

Page 2 of 12

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Current Invoice Summary

	Total Due this Invoice	\$326,458.50	\$40,460.87	\$0.00	\$366,919.37
Totals for	Litigation Matters	325,446.00	40,457.63	0.00	365,903.63
Litigation 05001	v. Blue Sun Scientific,	325,446.00	40,457.63	0.00	365,903.63
Totals for	General Law Matters				
Matter General La	<u>Name</u> aw Matters	Fees	Expenses	Credits <u>Applied</u>	Total Due



Client Name: KPM Analytics North America Corporation Invoice Number - 368059 Client Number: 05016 June 15, 2023 Page 3 of 12 RE:

Fees

Date	Description of Services	Hrs.	Amount
	Total Fees Billed		

Summary of Services

Professional	Base Rate	Hours	Amount
Attorneys			

Expenses



Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 345 of 418



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Client Name: KPM Analytics North Am	erica Corporation	Invoice Number - 368059
Client Number: 05016	June 15, 2023	Page 4 of 11

Total Current Billings on Matter



Client Name: KPM Analytics Nor	th America Corporation	Invoice Number - 368059
Client Number: 05016	June 15, 2023	Page 5 of 11

RE: 05001-v. Blue Sun Scientific, LLC et al

Fees

<u>Date</u>		Description of Services	Hrs.	Amount
05/01/23	JTG	Final pretrial preparation; team meetings; attention to witnesses and logistics.	16.70	11,272.50
05/01/23	KRM	Review, analyze, and develop strategy concerning defendants' proposed verdict form and correspondence with opposing counsel concerning anticipated order of witnesses; review and analyze clerk's notes and transcript from final pre-trial conference; correspondence with damages experts concerning	7.80	3,939.00
		review and analyze defendants' statements concerning counsel and represented parties; travel to Worcester for trial		
05/01/23	KWS	Review transcript from pretrial hearing with Judge Guzman; conduct legal research regarding introduction of evidence under Rule 609	0.90	454.50
05/01/23	SWR	Deliver and set up computer equipment for hotel work room; coordinate delivery of printers and related equipment; review and organize exhibits and deposition transcripts; coordinate logistics for lunch delivery	8.40	2,604.00
05/02/23	JTG	Prepare for and conduct jury selection; continued work on Opening arguments; prepare witnesses and materials for testimony.	18.60	12,555.00
05/02/23	KRM	Develop strategy and prepare for trial day one, including jury selection, opening statements, and trial witnesses; develop strategy for final jury instructions; research and analysis concerning recent decision in District of Massachusetts and impact on trial themes and post-trial briefing	12.60	6,363.00
05/02/23	KWS	Conduct legal research and analysis regarding redactions to trial exhibits not based on privilege	2.80	1,414.00
05/02/23	SWR	Prepare witness binders for use at trial; review and organize new exhibits; circulate Defendant's marked exhibits	13.20	4,092.00
05/03/23	JTG	Prepare for and Conduct Trial Day 1; Prepare for Day 2	18.30	12,352.50
05/03/23	KRM	Trial day 1; prepare for trial day 2; develop strategy for expert damages testimony and draft outline for same	12.70	6,413.50
05/03/23	KWS	Conduct research regarding direct examination review transcript from first day of trial	1.10	555.50
05/03/23	SWR	Prepare multiple witness binders for use at trial; assist at trial; edit	9.20	2,852.00



	ame: KPl umber: 0	M Analytics North America Corporation 5016 June 15, 2023	Invoic	e Number - 368059 Page 6 of 11
<u>Date</u>		Description of Services	<u>Hrs.</u>	Amount
		witness binders; organize deposition transcripts for use at trial		
05/04/23	JTG	Prepare for and conduct Trial Day 2; prepare for Day 3	17.40	11,745.00
05/04/23	KRM	Trial day 2; prepare for trial day 3; develop strategy for expert testimony and draft outline for same	13.80	6,969.00
05/04/23	KWS	Review trial transcript	0.50	252.50
05/04/23	SWR	Create witness binders for trial; assist at trial; organize deposition transcripts for upcoming witnesses; review admitted exhibits; troubleshoot issues with printer/copiers	12.10	3,751.00
05/05/23	JTG	Trial Day 3; attention to logistics for next week.	9.30	6,277.50
05/05/23	KRM	Trial day 3; meeting with Mr. Mitchell and discuss trial week 1; develop strategy concerning damages; correspondence with damages expert concerning same; meet with IT team to discuss ShareFile and remote document access for trial team	9.50	4,797.50
05/05/23	KWS	Conduct legal research and analysis regarding admission of evidence under Rule 609	0.70	353.50
05/05/23	SWR	Organize exhibits for trial; assist at trial; organize exhibits for next witness (Lucas); resolve scanning and other issues with copy machines	8.10	2,511.00
05/06/23	JTG	Attention to witness order; work on Lucas and Gajewski outlines and exhibits.	10.80	7,290.00
05/07/23	JTG	Prepare for Trial Day 4.	15.40	10,395.00
05/07/23	KRM	Prepare for trial day 4; develop strategy for trial witnesses and admission of evidence; develop strategy for expert testimony on damages; draft of outline for direct examination of damages expert; correspondence with damages expert concerning same; research and develop strategy concerning evidence of fraud charges and guilty plea for cross-examination of Mr. Lucas	14.40	7,272.00
05/07/23	KWS	Conduct legal research and analysis regarding and admission of evidence of Mr. Lucas's criminal indictment and plea agreement	6.40	3,232.00
05/07/23	SWR	Prepare witness binders for upcoming witnesses; organize admitted trial exhibits; review and organize trial transcripts	7.10	2,201.00
05/08/23	JTG	Prepare for Trial Day 4; Trail day 4; post trial meetings; prepare for Day 5.	17.20	11,610.00
05/08/23	KRM	Trial day 4; prep for trial day 5; develop strategy for trial witnesses and admission of evidence; develop strategy for expert testimony; draft of outline for direct examination of damages expert; correspondence with damages expert concerning same; research and develop strategy concerning evidence; draft supplemental brief	14.70	7,423.50



	ame: KPM umber: 05	A Analytics North America Corporation 5016 June 15, 2023	Invoic	e Number - 368059 Page 7 of 11
<u>Date</u>		Description of Services	Hrs.	Amount
		concerning same		
05/08/23	KWS	Review transcript from Day Four of trial; conduct legal research and analysis regarding	3.80	1,919.00
05/08/23	SWR	Create and edit witness binders; review and edit listing of admitted exhibits; assist with Motion in Limine regarding Lucas documents; assist at trial	14.20	4,402.00
05/09/23	JSS	Research jury instructions regarding material breach of contract; research material breach of contract	1.00	435.00
05/09/23	JTG	Prepare for Day 5; Trial Day 5; post trial meetings; Prepare for Day 6.	16.10	10,867.50
05/09/23	KRM	Trial day 5; prep for trial day 6; meet with KPM team to discuss results of trial day 5; develop strategy for expert testimony draft of outline for direct examination of damages expert; correspondence with damages expert concerning same; research and develop strategy concerning supplemental jury instruction relating to preliminary injunction; draft supplemental jury instruction; draft final jury instructions	16.30	8,231.50
05/09/23	KWS	Review supplemental brief regarding Rule 609 evidence; review trial transcript	0.80	404.00
05/09/23	SWR	Review and edit witness binders for trial; assist at trial; edit listing of admitted exhibits; organize copies of documents needed for next trial day	14.00	4,340.00
05/10/23	BDH	Research jury instructions related to	1.10	665.50
05/10/23	JSS	Research jury instructions with attention	4.20	1,827.00
05/10/23	JTG	Prepare for Day 7; Trial Day 7; post trial day meetings; prepare for Day 8.	17.70	11,947.50
05/10/23	KRM	Trial day 6; prep for trial day 7; meet with KPM team to discuss results of trial day 6; develop strategy for expert testimony on damages; draft of outline for direct examination of damages expert; draft presentation slides for same; draft final jury instructions; develop strategy for judgment as a matter of law and special verdict form	15.80	7,979.00
05/10/23	SWR	Prepare updated exhibits lists and recently filed pleadings for use in court; make final edits to witness binders; assist at trial; review and organize admitted exhibits	9.40	2,914.00
05/11/23	JTG	Complete preparation and attend trial day; post trial meetings; prepare for following trial day.	14.60	9,855.00
05/11/23	KRM	Trial day 7; prep for trial day 8; meet with KPM team to discuss results of trial day 7; develop strategy for expert testimony on damages; draft of outline for direct examination of damages expert; draft presentation	16.20	8,181.00



	ame: KPI umber: 0:	M Analytics North America Corporation 5016 June 15, 2023	Invoic	e Number - 368059 Page 8 of 11
<u>Date</u>		Description of Services	Hrs.	<u>Amount</u>
		slides for same; draft final jury instructions; develop strategy for special verdict form		
05/11/23	KWS	Review trial testimony transcripts	0.80	404.00
05/11/23	SWR	Coordinate updating multiple sets of witness binders; organize exhibit lists, pleadings, and other documents for use in Court; assist at trial; prepare witness binders for upcoming witnesses	10.10	3,131.00
05/12/23	JSS	Review and analyze Day 8 trial transcript and KPM's proposed final jury instructions	0.40	174.00
05/12/23	JTG	Trial Day 8 - Prepare for and present witnesses; follow up strategy session; plan for trail final days including experts; attention to jury instruction legal issues and to elements for closing arguments.	11.60	7,830.00
05/12/23	KRM	Trial day 8; meet with KPM team to discuss results of trial day 8; review and analyze defendants' supplemental damages report and corresponding new trial exhibit; correspondence with opposing counsel concerning objections to supplemental report, new trial exhibit, and additional testimony of Irvin Lucas; develop strategy for cross examination of defendants' damages expert; review and analyze defendants' proposed jury instructions and verdict form; develop strategy for charge conference	11.10	5,605.50
05/12/23	KWS	Review trial transcript	0.70	353.50
05/12/23	SWR	Review and update notebooks; print and circulate revised exhibit lists; assist at trial; coordinate breakdown and clearing of conference room; organize hard copies of admitted exhibits for review	9.70	3,007.00
05/13/23	JTG	Assemble evidence for closings.	5.60	3,780.00
05/13/23	KRM	Develop strategy for cross examination of defendants' damages expert; draft of outline for same; review and analyze defendants' proposed jury instructions and verdict form; develop strategy for charge conference and closing argument	8.30	4,191.50
05/14/23	JTG	Work on closing and legal issues; team meeting t assemble evidence for closings and finalize themes.	8.80	5,940.00
05/14/23	KRM	Prepare for trial day 9; develop strategy for cross examination of defendants' damages expert; draft of outline for same; review and analyze defendants' proposed jury instructions and verdict form; develop strategy for charge conference and closing argument; review of trial testimony for same	10.50	5,302.50
05/14/23	KWS	Analyze exhibit list	1.10	555.50
05/14/23	SWR	Organize admitted exhibits for review; assist with developing slides for closing arguments; print and circulate witness outlines and documents regarding jury instructions	5.60	1,736.00
05/15/23	JTG	Complete preparation for final day of testimony; Trial and expert	13.20	8,910.00



	ame: KPN umber: 0:	M Analytics North America Corporation 5016 June 15, 2023	Invoic	e Number - 368059 Page 9 of 11
<u>Date</u>		Description of Services	Hrs.	<u>Amount</u>
		witnesses; jury instruction charge conference; attention to jury instruction legal issues; work on closing arguments.		
05/15/23	KRM	Trial day 9; prepare for trial day 10; research, develop strategy, and draft brief concerning trade secret misappropriation jury instruction; develop strategy concerning closing arguments; review and analyze court's proposed jury instructions and verdict form and develop strategy for charge conference	13.60	6,868.00
05/15/23	KWS	Conduct legal research and analysis regarding jury instruction on misappropriation; review trial transcript	3.30	1,666.50
05/15/23	SWR	Print and circulate revised jury instructions and related documents; assist at trial; review final listing of admitted exhibits to prepare hard copy set for jury; coordinate pickup of boxes at hotel and delivery to Boston	7.40	2,294.00
05/16/23	JSS	Review trial transcript from Day 9 and the memorandum of law submitted by KPM regarding willful and malicious	0.60	261.00
05/16/23	JTG	Prepare and deliver closing arguments; prepare and argue jury instructions and verdict form issues; return to Court for jury discharge for the day.	11.00	7,425.00
05/16/23	KRM	Trial day 10; draft additions to court's proposed jury instructions; develop strategy concerning objections to same; charge conference	9.70	4,898.50
05/16/23	KWS	Review trial transcript	0.60	303.00
05/16/23	SWR	Organize hard copies of all admitted exhibits for jury; review and circulate updated versions of jury instructions; clear boxes from courtroom	8.50	2,635.00
05/17/23	JTG	Attend Court for Jury question; receive verdict; post verdict discussion with Court and opposing counsel; post verdict team discussions; plan for post trial motions; clean up from trial site and hotel.	6.30	4,252.50
05/17/23	KRM	Trial day 11; analyze jury verdict and develop strategy for post-trial motions and briefing	6.40	3,232.00
05/17/23	SWR	Coordinate pickup of rented equipment from hotel work room; shred extra copies of deposition transcripts and other confidential documents; assist at trial; remove all documents and supplies from court and from hotel	8.30	2,573.00
05/18/23	JSS	Discuss KPM options post-trial and pre-judgment; review steps that Benchmark took post-judgment	0.50	217.50
05/18/23	JTG	Attention to press issues regarding verdict; attention to post trial options; communications with client.	2.10	1,417.50
05/18/23	KRM	Correspondence concerning strategy for replies to press inquiries	0.50	252.50
05/18/23	SWR	Organize admitted exhibits, transcripts, and other records of trial	1.10	341.00



	ame: KPl umber: 0	M Analytics North America Corporation 5016 June 15, 2023	Invoic	e Number - 368059 Page 10 of 1
<u>Date</u>		Description of Services	<u>Hrs.</u>	Amount
05/23/23	JSS	Review and analyze strategy; analyze legal strategy for filing motions of research	2.80	1,218.00
05/23/23	JTG	Meetings regarding post trial motion options; attention to schedule.	2.30	1,552.50
05/23/23	KRM	Develop strategy for post-trial motions and briefing; correspondence concerning same	2.10	1,060.50
05/24/23	JTG	Team emails on post trial motions and schedule.	1.40	945.00
05/24/23	KRM	Correspondence with opposing counsel concerning post-trial briefing schedule; develop strategy for redactions to trial transcripts and correspondence with Mr. Olson concerning same	0.60	303.00
05/25/23	BDH	Analyze jurisdiction for attaching out-of-state assets	0.10	60.50
05/25/23	JSS	Research rules; prepare memorandum summarizing	2.10	913.50
05/25/23	KRM	Develop strategy for post-trial motions and briefing	0.60	303.00
05/25/23	SWR	Assist with legal research regarding post-trial motions	0.80	248.00
05/26/23	JTG	Correspondence with opposing counsel regarding post trial motion scheduling	2.00	1,350.00
05/26/23	KRM	Correspondence with opposing counsel concerning post-trial briefing schedule	0.20	101.00
05/30/23	JTG	Prepare for and conduct team zoom meeting to finalize post trial strategy recommendations and motion drafting responsibilities and schedule; attention to related legal issues.	3.20	2,160.00
05/30/23	KRM	Correspondence with opposing counsel concerning post-trial briefing schedule; draft joint motion to set briefing schedule; file same with court; develop strategy for post-trial briefing	1.30	656.50
05/31/23	KRM	Review orders mooting motions in limine and granting motion to extend time to file post-trial motions and briefing	0.20	101.00
		Total Fees Billed		\$325,446.00

Summary of Services

	Base		
Professional	Rate	Hours	Amount
Attorneys			



Client Name: KPM Analytics North	America Corporation	Invoice Number - 368059
Client Number: 05016	June 15, 2023	Page 11 of 11

		Base		
Professional		Rate	Hours	Amount
JTG	John T Gutkoski	675.00	239.60	\$161,730.00
BDH	Bryan D Harrison	605.00	1.20	\$726.00
KRM	Kevin R. Mosier	505.00	198.90	\$100,444.50
JSS	Jacqueline S. Salwa	435.00	11.60	\$5,046.00
KWS	Katherine W. Soule	505.00	23.50	\$11,867.50
Paralegals SWR	Steven W. Ramsdell	310.00	147.20	\$45,632.00

Expenses

Description of Expense	<u>Amount</u>
Computer Research	2,964.69
Lodging	18,484.21
Meals	949.68
Office Supplies	116.26
Parking	73.00
Photocopies, Outside Services	12,578.88
Reference Materials	71.40
Shipping via Fedex, DHL, or other commercial carrier	237.86
Translation Services	2,814.30
Travel	783.15
Printing	1,384.20

Total Expenses Billed \$40,457.63

Total Current Billings on Matter

\$365,903.63

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 353 of 418



Winning Intellectual Property®

Client Name: KPM Analytics North America Corporation

Client Number: 05016

Invoice Number - 368059

Page 12 of 12



July 13, 2023

Client Number: 05016 Invoice Number: 368573

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Total Invoice Amount
Less Credits and Trust To Be Applied to Invoice

Total Due This Invoice

\$168,480.03

\$168,480.03

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 355 of 418



Winning Intellectual Property®

Client Name: KPM Analytics North America Corporation

Client Number: 05016

Invoice Number - 368573

Page 2 of 7

Mr. Brian Mitchell Chief Executive Officer KPM Analytics North America Corporation 8 Technology Drive Westborough, MA 01581

Current Invoice Summary

<u>Matter</u>	Name	<u>Fees</u>	<u>Expenses</u>	Credits <u>Applied</u>	<u>Total Due</u>
Litigation I	Matters v. Blue Sun Scientific,	150,581.50	17,898.53	0.00	168,480.03
Totals for I	Litigation Matters	150,581.50	17,898.53	0.00	168,480.03
	Total Due this Invoice	\$150,581.50	\$17,898.53	\$0.00	\$168,480.03



Client Name: KPM Analytics North America Corporation

Client Number: 05016

Invoice Number - 368573

Page 3 of 7

RE: 05001-v. Blue Sun Scientific, LLC et al

Fees

Date		Description of Services	<u>Hrs.</u>	Amount
06/01/23	BDH	Develop strategy for drafting motion for attorney's fees	0.60	363.00
06/01/23	KRM	Research, analyze, and develop strategy for post-trial motions and briefing; draft same	6.10	3,080.50
06/01/23	SWR	Coordinate creation of hard copy sets of transcripts and admitted exhibits	1.10	341.00
06/05/23	JTG	Post trial briefing work and review of trial record.	7.10	4,792.50
06/05/23	KRM	Research, analyze, and develop strategy concerning post-trial motions and briefing; correspondence with Mr. Mitchell and Mr. Olson; draft same	4.70	2,373.50
06/05/23	SWR	Review deadlines for post-trial motions	0.20	62.00
06/06/23	JTG	Attention to permanent injunction motion and related evidence.	5.30	3,577.50
06/06/23	KRM	Develop strategy concerning post-trial briefing; correspondence with KPM team concerning same; research and analyze case law for motion for attorneys' fees and costs; draft same	7.10	3,585.50
06/06/23	SWR	Organize working copies of trial transcripts and admitted exhibits	1.10	341.00
06/07/23	JSS	Review and analyze in order to find references to Blue Sun interacting with customers of KPM	1.70	739.50
06/07/23	KRM	Research and analyze case law for motion for attorneys' fees and costs; develop strategy concerning same; draft same; correspondence concerning post-trial briefing strategy and evidence	4.20	2,121.00
06/08/23	JSS	Review and analyze in order to find citations for Motion for Preliminary Injunction; review and analyze in order to find citations for Motion for Preliminary Injunction; review and analyze in order to find citations for Motion for Preliminary Injunction	5.40	2,349.00
06/08/23	JTG	Work on post trial motions.	7.30	4,927.50
06/08/23	KRM	Draft motion for attorneys' fees and costs; research, analyze, and develop strategy concerning same	5.60	2,828.00
06/09/23	JSS	Review and analyze preliminary injunction and thereto	1.70	739.50
06/09/23	KRM	Research, analyze, and develop strategy for motion for attorneys' fees and costs; draft same	4.70	2,373.50



Client Name: KPM Analytics North America Corporation Client Number: 05016 July 13, 2023				Invoice Number - 368573 Page 4 of 7	
<u>Date</u>		Description of Services	Hrs.	Amount	
06/12/23	JSS	Review and analyze for the preliminary injunction	3.90	1,696.50	
06/12/23	JTG	Review cases and evidentiary record for post trial motions	5.90	3,982.50	
06/12/23	KRM	Research, analysis, and strategy for motion for attorneys' fees and costs; draft same	7.50	3,787.50	
06/13/23	JSS	evidence for permanent injunction	2.10	913.50	
06/13/23	JTG	Attention to trial record, testimony and exhibits	6.20	4,185.00	
06/13/23	KRM	Research, analysis, and strategy for motion for attorneys' fees and costs; review documentation for same; draft same	5.20	2,626.00	
06/13/23	SWR	Review and organize invoices for trial-related expenses	1.20	372.00	
06/14/23	JSS	Review and analyze for permanent injunction	2.80	1,218.00	
06/14/23	JTG	Work on post trial injunction motion.	5.40	3,645.00	
06/15/23	JTG	Prioritze evidence from trial record for motions.	6.10	4,117.50	
06/15/23	KRM	Draft motion for attorneys' fees and costs; collect and review materials and exhibits for same	8.30	4,191.50	
06/16/23	JTG	Post trial motions; attention to case's legal bills and what we can claim from defandants	7.70	5,197.50	
06/16/23	KRM	Correspondence with B. Mitchell, C. Ross, and E. Olson concerning motion; review invoices to calculate compensable fees and costs; develop strategy concerning proposed form of final judgment	3.70	1,868.50	
06/16/23	SWR	Review and organize collections of documents, related to motion practice	0.20	62.00	
06/17/23	JSS	Review and analyze for permanent injunction	1.80	783.00	
06/17/23	JTG	Post trial motions.	10.20	6,885.00	
06/18/23	JSS	Review and analyze for permanent injunction	5.90	2,566.50	
06/18/23	JTG	Draft, edit/revise Post trial motions.	14.20	9,585.00	
06/19/23	JSS	Review and analyze for the motion for permanent injunction	5.10	2,218.50	
06/19/23	JTG	Continue to develop Post trial motions.	12.60	8,505.00	
06/20/23	JSS	Review and analyze for the motion for permanent	2.90	1,261.50	



Client Name: KPM Analytics North America Corporation Client Number: 05016 July 13, 2023			Invoice Number - 368573 Page 5 of 7	
<u>Date</u>		<u>Description of Services</u>	Hrs.	Amount
		injunction		
06/20/23	JTG	Edit post trial motion drafts from team and continue writing permanent injunction motion and supporting materials.	13.70	9,247.50
06/20/23	KRM	Review and analyze drafts of post-trial motions and briefing; develop strategy concerning same; research concerning motion for attorneys' fees and costs; draft same; review and redact invoices concerning same; draft declarations for same	7.80	3,939.00
06/21/23	JSS	Draft motion to seal deposition testimony; excerpt Mr. Lucas transcript for declaration; review and revise motion in support of permanent injunction	2.80	1,218.00
06/21/23	JTG	Work with team to finalize and file all post trial motions and submissions.	13.30	8,977.50
06/21/23	KRM	Draft motion for leave to file declaration in support of motion for permanent injunction under seal; draft declaration in support of motion for permanent injunction; review and analyze drafts of post-trial motions and briefing; develop strategy concerning same; draft motion for attorneys' fees and costs; review and redact invoices concerning same; draft declarations for same; edit motion for permanent injunction; correspondence with KPM team concerning post-trial briefing; meet and confer with opposing counsel concerning post-trial briefing and motion to seal; coordinate filing of post-trial briefing; correspondence with court clerks concerning issue with sealed filing	10.20	5,151.00
06/22/23	JTG	Review defendants' motions and schedule;	3.60	2,430.00
06/22/23	KRM	Review and analyze defendants' post-trial motions and briefing; develop strategy for oppositions to same	2.20	1,111.00
06/23/23	JTG	Attention to additional questions on legal bills for motion.	2.50	1,687.50
06/23/23	KRM	Correspondence with client concerning post-trial motions and briefing; develop strategy for oppositions to defendants motions to alter judgment	0.70	353.50
06/26/23	JTG	Prepare for and lead team call on post trial oppositions to defendants' motions.	4.40	2,970.00
06/26/23	KRM	Develop strategy for oppositions to defendants' post-trial motions and potential appellate issues; research and analysis for same	3.40	1,717.00
06/28/23	JTG	Attention to post trial issues.	2.80	1,890.00
06/29/23	KRM	Research, analyze, and develop strategy for opposition to defendants' motion to alter or amend judgment; draft same	4.20	2,121.00
06/30/23	JTG	Review cases relied on by defendants' motions.	3.10	2,092.50
06/30/23	KRM	Research, analyze, and develop strategy for opposition to defendants'	2.80	1,414.00



Date Description	of Services	Hrs.	Amount
Client Number: 05016	July 13, 2023		Page 6 of 7
Client Name: KPM Analytics No	Invoice Number - 368		

motion to alter or amend judgment; draft same

Total Fees Billed \$150,581.50

Summary of Services

		Base		
Professional		Rate	Hours	Amount
Attorneys				
JTG	John T Gutkoski	675.00	131.40	\$88,695.00
BDH	Bryan D Harrison	605.00	0.60	\$363.00
KRM	Kevin R. Mosier	505.00	88.40	\$44,642.00
JSS	Jacqueline S. Salwa	435.00	36.10	\$15,703.50
Paralegals SWR	Steven W. Ramsdell	310.00	3.80	\$1,178.00

Expenses

<u>Description of Expense</u>	<u>Amount</u>
Computer Research	392.92
Lodging	16,396.71
Photocopies, Outside Services	1,091.62
Printing	17.28
Total Expenses Billed	\$17,898.53

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 360 of 418



Winning Intellectual Property®

Client Name: KPM Analytics North An	nerica Corporation	Invoice Number - 368573
Client Number: 05016	July 13, 2023	Page 7 of 7

Total Current Billings on Matter

\$168,480.03



Invoice

Bill To

John Gutkoski
Cesari and McKenna LLP
One Llberty Square
Boston, MA 02109

Date	5/12/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	Item	Description	Rate	Amount
4/6/2022	2	Technical Consulting	Run additional searches of data at the	200.00	400.00
4/6/2022	25.6	Native File Processing	request of counsel Process 12.86 GB of native files	225.00	5,760.00
4/6/2022	31	Insight Data Load	Load VOL014 to Insight	15.00	465.00
4/8/2022	1	Native File Processing	Process 3 native files with	25.00	25.00
4/8/2022	1	Insight Data Load	Load VOL015 to Insight	30.00	30.00
4/8/2022 4/8/2022	1 29.8	Technical Consulting TIFF Conversion	Coordinate production TIFF conversion of 29.8 GB of native electronic files	200.00 350.00	200.00 10,430.00
4/8/2022 4/8/2022	244,500 6	Endorse Images FTP Data Upload	Endorse images with Bates numbers FTP Data Upload - KMP004_01 - KPM004_06	0.005 50.00	1,222.50 300.00
4/8/2022	1	Insight Data Load	Overlay KPM004 production information	30.00	30.00
4/11/2022	1	Native File Processing	Process 6 native files with	25.00	25.00
4/11/2022	1	Insight Data Load	Load VOL016 to Insight	30.00	30.00
4/15/2022 4/15/2022	0.33 1	Technical Consulting FTP Data Upload	Format Blue Sun production for expert FTP Data Upload - PDF006_OppProd	200.00 50.00	66.00 50.00
4/15/2022	1	Native File Processing	Process 30 MB of native files	75.00	75.00
4/15/2022	1	Insight Data Load	Load VOL017 to Insight	30.00	30.00
		•	Total		•



Invoice

John Gutkoski Cesari and McKenna LLP One Llberty Square Boston, MA 02109

Date	5/12/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Project: KPM Analytics v Blue Sun

Date	Quantity	Item	Description	Rate	Amount
4/20/2022	1	Native File Processing	Process 7 native files	50.00	50.00
4/20/2022	1	Insight Data Load	Load VOL018 to Insight	30.00	30.00
4/20/2022 4/20/2022	0.33 2,282	Technical Consulting TIFF Conversion	Coordinate production TIFF conversion of 322 native electronic files	200.00 0.05	66.00 114.10
4/20/2022 4/20/2022	2,282 1	Endorse Images FTP Data Upload	Endorse images with Bates numbers FTP Data Upload - KPM005	0.01 50.00	22.82 50.00
4/21/2022	0.5	Native File Processing	Process 396 MB of native files	275.00	137.50
4/21/2022	1	Insight Data Load	Load VOL019 to Insight	30.00	30.00
4/22/2022 4/22/2022	0.33 1,332	Technical Consulting TIFF Conversion	Coordinate production TIFF conversion of 213 native electronic files	200.00 0.05	66.00 66.60
4/22/2022 4/22/2022	1,332 1	Endorse Images FTP Data Upload	Endorse images with Bates numbers FTP Data Upload - KPM006	0.01 50.00	13.32 50.00
4/24/2022	1.75	Insight Data Load	Load KPM005_6 to Insight	30.00	52.50
4/25/2022	1	Insight Data Load	Load DE001 (production) to Insight	30.00	30.00
4/27/2022	0.25	Technical Consulting	Provide PDF versions of produced document to counsel	200.00	50.00
4/27/2022	1	Insight Data Load	Load KPM004_1 to Insight	30.00	30.00
4/28/2022	0.33	Technical Consulting	Run additional searches	200.00	66.00
		1	Total		

Page 2



Invoice

John Gutkoski Cesari and McKenna LLP One LIberty Square Boston, MA 02109

Date	5/12/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	Item	Description	Rate	Amount
4/28/2022	1	Native File Processing	Process 128 MB of native files	75.00	75.00
4/28/2022	1	Insight Data Load	Load VOL020 to Insight	30.00	30.00
4/29/2022	1	Native File Processing	Process 1 native files	25.00	25.00
4/29/2022	1	Insight Data Load	Load VOL021 to Insight	30.00	30.00
4/30/2022	81.34	Insight Hosting	Host files in Insight repository for April 2022 MA Sales Tax	25.00 6.25%	2,033.50 0.00
		L	Total	\$	1 22,256.84



Invoice

Bill To
John Gutkoski Cesari and McKenna LLP One LIberty Square Boston, MA 02109

Date	7/13/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

	Date	Quantity	Item	Descrip	tion	Rate	Amount
Γ	6/1/2022	1	Insight Data Load	Load KPM008 to Insight		30.00	30.00
	6/30/2022	1 81.83	Insight Data Load Insight Hosting	Host files in Insight repo	sitory for June 2022	30.00 25.00 6.25%	30.00 2,045.75 0.00
					Total	9	2,075.75



Invoice

John Gutkoski Cesari and McKenna LLP One LIberty Square Boston, MA 02109

Date	8/9/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	Item	Description		Rate	Amount
7/12/2022	1	Native File Processing	Process 7 native files	Process 7 native files		25.00
7/12/2022	1	Insight Data Load	oad VOL026 to Insight		30.00	30.00
7/13/2022 7/13/2022	0.25 162	Technical Consulting TIFF Conversion	Coordinate production TIFF conversion of 7 native electronic	c files	200.00 0.05	50.00 8.10
7/13/2022 7/13/2022	162 1	Endorse Images FTP Data Upload	Endorse images with Bates numbers FTP Data Upload - KPM009		0.01 25.00	1.62 25.00
7/20/2022	1	Insight Data Load	Load KPM009 to Insight		30.00	30.00
7/31/2022	81.94	Insight Hosting	Host files in Insight repository for Jul MA Sales Tax	y 2022	25.00 6.25%	2,048.50 0.00
			Total	_		\$2,218.22



Invoice

Bill To
John Gutkoski Cesari and McKenna LLP One Llberty Square Boston, MA 02109

Date	9/10/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	ltem	Descrip	tion	Rate	Amount
8/26/2022	1	Insight Data Load	Load KPM004_3 to Insigh	nt	30.00	30.00
8/31/2022	81.94	Insight Hosting	Host files in Insight repo 2022	ository for August	25.00	2,048.50
			MA Sales Tax		6.25%	0.00
		1		Total	!	\$2,078.50



Invoice

Bill To
John Gutkoski Cesari and McKenna LLP One Llberty Square Boston, MA 02109

Date	10/10/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	Item	Descrip	otion	Rate	Amount
9/30/2022	81.94	Insight Hosting	Host files in Insight repo September 2022	ository for	25.00	2,048.50
			MA Sales Tax		6.25%	0.00
				Total		\$2,048.50



Invoice

Bill To

John Gutkoski
Cesari and McKenna LLP
One Llberty Square
Boston, MA 02109

Date	11/9/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	ltem	Description	Rate	Amount
10/25/2022	1	Native File Processing	Process three native files	25.00	25.00
10/25/2022	1	Insight Data Load	Load VOL027 to Insight	30.00	30.00
10/26/2022 10/26/2022	0.25 42	Technical Consulting TIFF Conversion	Coordinate production TIFF conversion of 3 native electronic file	200.00 es 0.05	50.00 2.10
10/26/2022 10/26/2022	42 1	Endorse Images FTP Data Upload	Endorse images with Bates numbers FTP Data Upload - KPM010	0.01 25.00	0.42 25.00
10/28/2022	1	Insight Data Load	Load KPM010 to Insight	30.00	30.00
10/31/2022	81.95	Insight Hosting	Host files in Insight repository for Octobe 2022	er 25.00	2,048.75
			MA Sales Tax	6.25%	0.00
			Total		\$2,211.27



Invoice

John Gutkoski Cesari and McKenna LLP One LIberty Square Boston, MA 02109

Date	12/8/2022
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	Item	Descrip	tion	Rate	Amount
11/18/2022	1	Insight Data Load	Load KPM004_4 to Insight		30.00	30.00
11/21/2022	1	Native File Processing	Process two native files		25.00	25.00
11/21/2022	4	TIFF Conversion	TIFF conversion of two native electronic files		0.05	0.20
11/21/2022	4 1	Endorse Images FTP Data Upload	Endorse images with Bat FTP Data Upload - KPM0		0.01 25.00	0.04 25.00
11/21/2022	1	Insight Data Load	Load VOL028 to Insight		30.00	30.00
11/22/2022	1	Insight Data Load	Load KPM011 to Insight		30.00	30.00
11/30/2022	81.95	Insight Hosting	Host files in Insight repo	sitory for November	25.00	2,048.75
			MA Sales Tax		6.25%	0.00
				Total	:	\$2,188.99



Invoice

Bill To
John Gutkoski Sunstein LLP 100 High Street Boston, MA 02110

Date	2/10/2023
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	Item	Descrip	tion	Rate	Amount
1/31/2023	81.95	Insight Hosting	Host files in Insight repo	sitory for January	25.00	2,048.75
			MA Sales Tax		6.25%	0.00
				Total	:	\$2,048.75



Invoice

Bill To
John Gutkoski Sunstein LLP 100 High Street Boston, MA 02110

Date	3/7/2023
Invoice #	
P.O. No.	
Terms	Net 30
EIN #	

Date	Quantity	Item	Descrip	tion	Rate	Amount
2/28/2023	81.96	Insight Hosting	Host files in Insight repo 2023	sitory for February	25.00	2,049.00
			MA Sales Tax		6.25%	0.00
				Total		\$2,049.00



Invoice

Bill To	
John Gutkoski Sunstein LLP 100 High Street Boston, MA 02110	

Date	4/7/2023
Invoice #	
P.O. No.	
Terms	Net 30
EIN #	

Date	Quantity	ltem	Descrip	tion	Rate	Amount
3/2/2023 3/2/2023	0.5 0.5	Technical Consulting Native File Processing	Organize deposition mat Process 468 MB of native		200.00 275.00	100.00 137.50
3/2/2023	1	Insight Data Load	Load DEPO001 to Insight		30.00	30.00
3/31/2023	82.7	Insight Hosting	Host files in Insight repo	sitory for March	25.00	2,067.50
			MA Sales Tax		6.25%	0.00
				Total		\$2,335.00



Invoice

Bill To
John Gutkoski Sunstein LLP 100 High Street Boston, MA 02110

Date	7/7/2023
Invoice #	
P.O. No.	
Terms	Net 30
EIN#	

Date	Quantity	Item	Description	Rate	Amount
6/21/2023	0.25	Technical Consulting	Send requested documents to counsel	200.00	50.00
6/30/2023	84.68	Insight Hosting	Host files in Insight repository for June 2023 MA Sales Tax	25.00 6.25%	2,117.00 0.00
			Total		\$2,167.00

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 57390 February 11, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$87,412.50

CURRENT DISBURSEMENTS: \$11,464.50

TOTAL DUE THIS BILL: \$98,877.00

TOTAL NOW DUE: \$98,877.00

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 57390 February 11, 2022 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH January 31, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	<u>Description</u>	<u>Time</u>	Rate
01/03/2022	JTG	REVIEW TRANSCRIPTS AND EXHIBITS; REVIEW ND REVISE	6.70 Hrs	675.00 /hr
01/04/2022	JTG	TEAM CORR. RE: REVISIONS TO SUBPOENA AND DOC. REQUESTS FOR INDIVIDUAL DEFENDANTS; ATTENTION TO HARD DRIVE REVIEW STATUS.	4.90 Hrs	675.00 /hr
01/05/2022	JTG	CORR. W/ EXPERTS; TEAM CORR. RE: SUBPOENA SERVICE; ATTENTION TO TOPICS.	5.40 Hrs	675.00 /hr
01/06/2022	JTG	FURTHER ATTENTION TO SUBPOENA AND DISCOVERY ISSUES; CORR. W/OPPOSING COUNSEL.	4.80 Hrs	675.00 /hr
01/07/2022	JTG	REVIEW, REVISE AND SUPPLEMENT REQUESTS TO GLENISTER, LUCAS, GAJEWSKI AND EILERT.	6.60 Hrs	675.00 /hr
01/10/2022	JTG	WRITTEN DISCOVERY ISSUES AND RELATED TEAM CORR.	6.60 Hrs	675.00 /hr
01/11/2022	JTG	SERVICE OF SUBPOENA AND REQUEST TO INDIVIDUAL DEFENDANTS; ATTENTION TO DEPOSITION PREP.; CORR. WITH CLIENT.	5.20 Hrs	675.00 /hr
01/12/2022	JTG	ATTENTION TO NEWS RE: WORK ON DEPOS. AND DISC. PREP.	6.70 Hrs	675.00 /hr
01/13/2022	JTG	ATTENTION TO PRODUCED DOCUMENT ISSUES.	5.20 Hrs	675.00 /hr
01/14/2022	JТG	CORR. W/ OPPOSING COUNSEL RE: SCHEDULE AND DISCOVERY ISSUES; LETTER RE: DOCS.; TEAM CORR.; COMMUNICATION WITH CLIENT.	7.30 Hrs	675.00 /hr

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 376 of 418

CESARI ANI	D MCK	ENNA, LLP	BILL NUMBI	ER 57390
01/17/2022	JTG	DEPOSITION WORK.	4.40 Hrs	675.00 /hr
01/18/2022	JТG	ATTENTION TO NEGOTIATING SCHEDULE EXTENSION; DEPOS. PREP.	4.60 Hrs	675.00 /hr
01/19/2022	JTG	WRITTEN DISCOVERY REVIEW AND EDITS.	3.50 Hrs	675.00 /hr
01/20/2022	JTG	REVIEW COURT'S REVISED SCHEDULING ORDER; ATTENTION TO DRAFT DISCOVERY REQUESTS TO CORP DEFENDANTS; CORR. WITH OPPOSING COUNSEL RE: SUBPOENA RESULTS.	6.80 Hrs	675.00 /hr
01/21/2022	JTG	DISCOVERY DRAFTING.	5.80 Hrs	675.00 /hr
01/24/2022	JTG	CONTINUED ATTENTION TO CORPORATE DAMAGES DISCOVERY; SCHEDULE DEPOSITION WITH DEFENSE COUNSEL.	6.20 Hrs	675.00 /hr
01/25/2022	JTG	TEAM EMAILS; DEPOS. SCHEDULE; FURTHER ATTENTION TO INFO NEEDED	6.90 Hrs	675.00 /hr
01/26/2022	JTG	DEPOSITION PREPARATION AND REVIEW POTENTIAL EXHIBITS.	5.70 Hrs	675.00 /hr
01/27/2022	JTG	PREPARE FOR M. GAJEWSKI DEP.	5.80 Hrs	675.00 /hr
01/28/2022	JTG	ADDITIONAL PREP. FOR DEPOSITION.	6.30 Hrs	675.00 /hr
01/29/2022	JTG	WORK ON CORPORATE DEFENDANT DISCOVERY	5.80 Hrs	675.00 /hr
01/31/2022	JTG	PREPARE FOR AND DEPOSE M. GAJEWSKI; FOLLOW UP TEAM CALLS; WORK ON CORP. DEFENDANT DISCOVERY REQUESTS.	8.30 Hrs	675.00 /hr

TOTAL SERVICES: \$87,412.50

SERVICES SUMMARY

Gutkoski, John T. 129.50 675.00 \$87,412.50

DISBURSEMENTS:

Target Litigation Consulting, Inc.; CONSULTING FEES
01/11/22

Stone Turn Group, LLP; EXPERT FEES 01/25/22

\$7,781.50

Target Litigation Consulting, Inc.; CONSULTING FEES
02/07/2022

\$804.75

TOTAL DISBURSEMENTS: \$11,464.50

MATTER TOTAL: \$98,877.00

BILL NUMBER

57390

TOTAL DUE THIS BILL:

\$98,877.00

TOTAL NOW DUE:

\$98,877.00

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 57706 March 11, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$91,867.50

CURRENT DISBURSEMENTS: \$922.75

TOTAL DUE THIS BILL: \$92,790.25

PRIOR BALANCE DUE: \$98,877.00

TOTAL NOW DUE: \$191,667.25

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number: 57706

March 11, 2022

File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH February 28, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	<u>Description</u>	<u>Time</u>	<u>Rate</u>
02/01/2022	JTG	COMPLETE WORK ON, REVISE AND	7.80 Hrs	675.00 /hr
		FINALIZE DISCOVERY REQUESTS TO BS		
		AND ITG; RELATED TEAM CORR.;		
02/02/2022	JTG	ANALYSIS OF DOC REQUESTS AND	7.10 Hrs	675.00 /hr
02/02/2022	JIO	INTERROGATORIES FROM DEFENDANTS;	7.10 1115	0/3.00 / III
		STRATEGIC DIRECTION DEFENDANTS		
		ARE TAKING; ATTENTION TO DEPOS.		
		ISSUES; CALL WITH B. MITCHELL.		
02/03/2022	JTG	REVIEW DEP TRANSCRIPTS AND	6.30 Hrs	675.00 /hr
	TH 0	RELATED DISC.		4== 00 /1
02/04/2022	JTG	CONDUCT FINANCIAL AND DAMAGES	5.60 Hrs	675.00 /hr
		ANALYSIS AND ATTENTION TO RELATED EVIDENCE.		
02/07/2022	JTG	VARIOUS DISCOVERY ISSUES; CORR. WITH	6.60 Hrs	675.00 /hr
02/01/2022	JIO	CLIENT TO SET UP	0.00 1113	073.00 7 III
		MTG; INQUIRY OF DOCS ALREADY		
		COLLECTED.		
02/08/2022	JTG	ATTENTION TO DISCOVERY ISSUES.	5.80 Hrs	675.00 /hr
02/09/2022	JTG	ATTENTION TO TRANSCRIPTS CONTENTS	8.30 Hrs	675.00 /hr
		; PREPARE		
		FOR AND LEAD CONF CALL WITH TEAM		
		REGARDING DOCS,		
02/10/2022	JTG	REVIEW OBJECTIONS AND RESPONSES	8.70 Hrs	675.00 /hr
	_	OF INDIVIDUAL DEFENDANTS; FOLLOW		
		UP ON TEAM CALL RE: DOC		
		COLLECTION, REVIEW AND		
		PRODUCTION; COMMENTS ON		

CESARI AND MCKENNA, LLP			BILL NUMBE	R 57706
02/11/2022	JТG	INTERROGATORIES; CLIENT EMAILS. DISTRIBUTE COMMENTS ON INTERROGATORY TREATMENTS; TEAM EMAILS; CORR. WITH EXPERTS	6.20 Hrs	675.00 /hr
02/14/2022	JTG	WORK WITH TEAM ; FOLLOW UP QUESTIONS ON INTERROGATORIES; TEAM CORR.	5.90 Hrs	675.00 /hr
02/15/2022	JTG	ATTENTION TO MULTIPLE DISCOVERY ISSUES.	6.70 Hrs	675.00 /hr
02/16/2022	JTG	ATTENTION TO DOCS PRODUCED BY INDIVIDUAL DEFENDANTS, OPTIONS TO MEET AND CONFER, RELATED ISSUES; ATTENTION TO OUR DOC COLLECTION AND CLIENT QUESTIONS.	7.20 Hrs	675.00 /hr
02/17/2022	JTG	DOC COLLECTION AND DISCOVERY ISSUES.	4.80 Hrs	675.00 /hr
02/18/2022	JTG	DOC COLLECTION PLANS AND ISSUES.	4.60 Hrs	675.00 /hr
02/21/2022	JTG	ATTENTION TO DOC ISSUES.	6.20 Hrs	675.00 /hr
02/22/2022	JTG	CALL WITH B. MITCHELL; ATTENTION TO SETTLEMENT PROPOSAL STRATEGY; ATTENTION TO MEET AND CONFER AND ISSUES TEAM CORR.; ATTENTION TO DOC COLLECTION CORR. AND ISSUES.	8.40 Hrs	675.00 /hr
02/23/2022	JTG	DOC. ISSUES; PREPARE FOR AND LEAD MEET AND CONFER WITH OPPOSING COUNSEL REGARDING EACH OF INDIVIDUAL DEFENDANTS' RESPONSES AND REFUSALS TO PRODUCE.	7.80 Hrs	675.00 /hr
02/24/2022	JTG	ATTENTION TO SETTLEMENT CORR.; ATTENTION AND COMMENTS ON OUR DISCOVERY WRITTEN RESPONSES AND OBJECTIONS; ; ATTENTION TO COLLECTION ISSUES AND RELATED CORR.	7.90 Hrs	675.00 /hr
02/25/2022	JTG	CONTINUE ATTENTION TO COMMENTS ON OUR DISCOVERY WRITTEN RESPONSES; ATTENTION TO DOCS IDENTIFIED BY TEAM; REVIEW RELATED TRANSCRIPT SECTIONS;	7.20 Hrs	675.00 /hr
02/27/2022	JTG	DISCOVERY RELATED CORR.	0.30 Hrs	675.00 /hr

2 of 4

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 381 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

57706

02/28/2022 JTG DOC. COLLECTION, WRITTEN RESPONSES 6.70 Hrs 675.00 /hr

AND ADDITIONAL DISCOVERY

QUESTIONS.

TOTAL SERVICES: \$91,867.50

SERVICES SUMMARY

Gutkoski, John T. 136.10 675.00 \$91,867.50

DISBURSEMENTS:

Target Litigation Consulting, Inc.; CONSULTING FEES \$922.75

03/10/2022

TOTAL DISBURSEMENTS: \$922.75

MATTER TOTAL: \$92,790.25

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 382 of 418

\$98,877.00

CESARI AND MCKENNA, LLP

BILL NUMBER

57706

TOTAL DUE THIS BILL:

\$92,790.25

BALANCE PRIOR STATEMENTS

57390 02/11/2022

PRIOR BALANCE DUE \$98,877.00

TOTAL NOW DUE: \$191,667.25

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number 57845

April 6, 2022

File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$135,830.00

CURRENT DISBURSEMENTS: \$10,220.00

TOTAL DUE THIS BILL: \$146,050.00

PRIOR BALANCE DUE: \$191,667.25

TOTAL NOW DUE: \$337,717.25

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number: 57845

April 6, 2022

File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH March 31, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u> 03/01/2022	<u>Atty</u> JTG	<u>Description</u> ATTENTION TO MULTIPLE DISCOVERY	<u>Time</u> 9.20 Hrs	<u>Rate</u> 675.00 /hr
00, 01, 2022	jī	ISSUES, DOC COLLECTION, DISCOVERY RESPONSES; ATTENTION TO SETTLEMENT PROPOSAL.). <u>2</u> 0 1110	0/0100 / III
03/02/2022	JTG	REVISIONS TO INTERROGATORY RESPONSES; ATTENTION TO DOCUMENT ISSUES AND CATEGORIES; REVIEW PLEADINGS.	7.90 Hrs	675.00 /hr
03/03/2022	JTG	DEPOSITION SCHEDULING; ANALYSIS OF REQUESTED WITNESSES; REVIEW OF RESPONSES AND ATTENTION TO DOCUMENT ISSUES.	7.70 Hrs	675.00 /hr
03/04/2022	JTG	DOCUMENT COLLECTION AND SEARCH ISSUES.	5.40 Hrs	675.00 /hr
03/05/2022	JTG	ATTENTION TO ISSUES AND	4.20 Hrs	675.00 /hr
03/07/2022	JTG	DOCUMENT COLLECTION AND ; DISCOVERY RESPONSES AND RELATED OBJECTIONS; RELATED TEAM EMAILS.	6.80 Hrs	675.00 /hr
03/08/2022	JTG	CORR. REGARDING SETTLEMENT RESPONSE; EMAILS WITH CLIENT; ATTENTION TO DEPOSITION NOTICE RELATED OBJECTIONS AND DECISIONS ON WHAT	8.70 Hrs	675.00 /hr
03/09/2022	JТG	TO PRODUCE; RELATED TEAM EMAILS. STUDY OF PROVIDED BY CLIENT; ATTENTION TO DOC SEARCH QUESTIONS AND RELATED RESULTS; REVIEW OBJECTIONS DRAFTED BY TEAM.	6.60 Hrs	675.00 /hr

CESARI AN	D MCKI	BILL NUMBE	R 57845	
03/10/2022	JТG	MESSAGES WITH EXPERTS; EMAILS WITH OPPOSING COUNSEL AND WITH TEAM REGARDING DEPOSITIONS AND ADDITIONAL WITNESSES; ATTENTION TO DOCS RE: ATTENTION TO	8.30 Hrs	675.00 /hr
03/11/2022	OMW	PER JOHN GUTKOSKI'S REOUEST, REVIEWED FOR ANALYSIS. DRAFTED AND DEVELOPED STRATEGY TO SHOW	3.40 Hrs	500.00 /hr
03/11/2022	JTG	ATTENTION TO AND RELATED CORR.; REVIEW DISCUSSION WITH PARTNER FOR ANALYSIS; DOC. COLLECTION RESULTS AND RELATED JUDGMENT CALLS; ATTENTION TO DEPOSITION ISSUES; CORR. WITH EXPERTS.	9.60 Hrs	675.00 /hr
03/12/2022	JТG	CORR. AND PRODUCTION FROM OPPOSING COUNSEL; PUSHBACK RE: SAME; ATTENTION TO CUSTOMER SUMMARY AND ANALYSIS; FURTHER ATTENTION TO ISSUES.	4.70 Hrs	675.00 /hr
03/13/2022	OMW		3.70 Hrs	500.00 /hr
03/14/2022	OMW	DRAFTED REVIEWED AND REVISED CHARTS. REVIEWED TO ANTICIPATE POTENTIAL ARGUMENTS REVIEWED EVERYTHING IN PREPARATION OF DISCUSSION LATER THIS WEEK WITH JOHN GUTKOSKI.	3.70 Hrs	500.00 /hr
03/14/2022	JТG	ATTENTION TO ISSUES WITH FORMAT OF DOC PRODUCTION FROM DEFENDANTS; CORR. WITH CLIENT RE: DEPOSITION WITNESSES AND RELATED ISSUES; ATTENTION TO REVIEW QUESTIONS; CONTINUE FACT DEVELOPMENT; DOC COLLECTION ISSUES.	7.70 Hrs	675.00 /hr
03/15/2022	JTG	PREPARE FOR AND LEAD TEAM MTG. RE: DISCOVERY ISSUES AND STRATEGY; CALL WITH CLIENT REGARDING WITNESSES	8.40 Hrs	675.00 /hr

CESARI AN	D MCKI	BILL NUMBE	R 57845	
		AND SCHEDULE		
03/16/2022	JTG	ATTENTION TO DCO. COLLECTION ISSUES. PREPARE FOR BUT THEN CANCEL CALL WITH OPPOSING COUNSEL; CORR. WITH EXPERTS; DOC. PRODUCTION AND	6.90 Hrs	675.00 /hr
03/17/2022	JTG	WITNESS SCHEDULE ISSUES. PREPARE AND CONDUCT MEET AND CONFER WITH OPPOSING COUNSEL RE: DEFENDANTS' OBJECTIONS AND CONCERNS WITH OUR RESPONSES AND OUR CONCERNS WITH THEIR OBJECTIONS AND POSITIONS; ATTENTION TO SCHEDULE AND EXTENSION AGREEMENT; CORR. WITH CLIENT RE: MESSAGES WITH EXPERTS.	7.60 Hrs	675.00 /hr
03/18/2022	OMW	CONTINUED WORKING ON CHART AND ARGUMENTS FOR	8.10 Hrs	500.00 /hr
03/18/2022	JTG	MEETING OVER REVIEW; ATTENTION TO ISSUES AND STANDING; REVIEW TRANSACTION DOCUMENTS; ATTENTION TO CASE DOC. PRODUCTION ISSUES; REVIEW SCHEDULE REVISION MOTION; ATTENTION TO QUESTIONS FROM DOC. VENDOR; EMAILS WITH CLIENT REPRESENTATIVES ON VARIOUS ISSUES.	9.10 Hrs	675.00 /hr
03/20/2022	OMW	COMPLETED CHART. SPOKE WITH JOHN GOTKOWSKI REGARDING DESCRIPTION OF DRAFTED ARGUMENT	4.10 Hrs	500.00 /hr
03/20/2022	JTG	REVIEW AND REVISE CHARTS FOR ANALYSIS; CALL WITH RE:ANALYSIS AND NEEDED FOLLOW UP.	3.20 Hrs	675.00 /hr
03/21/2022	JTG	ANALYSIS AND CHART REVIEW; ATTENTION TO WITNESS ISSUES; ATTENTION TO SCHEDULE REVISIONS.	7.80 Hrs	675.00 /hr
03/22/2022	OMW	BASED ON DISCUSSION WITH JOHN. REVIEWED ASSIGNMENT. DETERMINED STRATEGY TO ENSURE	0.80 Hrs	500.00 /hr
03/22/2022	JTG	COMPLETE AND SEND	7.40 Hrs	675.00 /hr

CESARI AND MCKENNA, LLP					BILL NUM	IBER 57845
		QUESTIONS RE: <u>POT</u> EN	CTIVITIES ESS OUTRE NTION TO	EACH DOC		
03/23/2022	JTG	NEGOTIATE SCHEDULZ WITH OPPOSING COUN FINALIZE WITH TEAM; THIRD PARTY WITNESS TO CUSTOMER RELATE QUESTIONS; ATTENTIC DOCUMENTS ISSUES; C CLIENT.	ISEL AND ATTENTIC SES; ATTEN ED DOCUM ON TO	ON TO NTION IENT	6.40 Hrs	675.00 /hr
03/24/2022	JTG	DEPOSITION PREPARATO DOCUMENT ISSUES; ATTEN SCHEDULING; REVIEW STANDING LAW AND	TION TO		7.70 Hrs	675.00 /hr
03/25/2022	JTG	DEPOSITION PREPARATO DOC PRODUCTION ISSUES WITH OPPOSING TEAM.	ISSUES AN	ND	5.50 Hrs	675.00 /hr
03/28/2022	JTG	ATTENTION TO DEPOS AND SCHEDULING; QU REGARDING DOC PROP REVIEW; ATTENTION TO BY TEAM.	ESTIONS DUCTION	AND	4.80 Hrs	675.00 /hr
03/29/2022	JTG	DEPOSITION SCHEDUL PREPARATION TASKS; A DOC REVIEW AND PRO	ATTENTIC		8.20 Hrs	675.00 /hr
03/30/2022	JTG	VARIOUS DOCUMENT A ISSUES; CALL WITH B. M			7.10 Hrs	675.00 /hr
03/31/2022	JTG	ATTENTION TO MULTI POINTS AND ISSUES WI COUNSEL.	PLE DISCO	OVERY	6.70 Hrs	675.00 /hr
0PPW 0P0 5	TT 63 6 .	D		TOTAL SEF	RVICES:	\$135,830.00
SERVICES S	UMMA	RY				
Wadhwa, Om	ar M.	23.80	500.00	\$11,900.00		
Gutkoski, Joh	ın T.	183.60	675.00	\$123,930.00		

DISBURSEMENTS:

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 388 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

57845

Stone Turn Group, LLP; EXPERT FEE Invoice 13654 03/28/2022

\$10,220.00

TOTAL DISBURSEMENTS:

\$10,220.00

MATTER TOTAL:

\$146,050.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 389 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

57845

TOTAL DUE THIS BILL: \$146,050.00

BALANCE PRIOR STATEMENTS

57390 02/11/2022 \$98,877.00 57706 03/11/2022 \$92,790.25

PRIOR BALANCE DUE \$191,667.25

TOTAL NOW DUE: \$337,717.25

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 58101 May 5, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$190,620.00

CURRENT DISBURSEMENTS: \$9,302.98

TOTAL DUE THIS BILL: \$199,922.98

PRIOR BALANCE DUE: \$238,840.25

TOTAL NOW DUE: \$438,763.23

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number: 58101

May 5, 2022

File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH April 30, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	Atty	Description	<u>Time</u>	Rate
04/01/2022	JTG	DISCOVERY DISPUTES AND DEPOSITION PLANNING; ATTENTION TO PRIOR TESTIMONY.	6.80 Hrs	675.00 /hr
04/02/2022	JTG	ATTENTION TO PRIOR TESTIMONY.	5.40 Hrs	675.00 /hr
04/02/2022	JTG	REVIEW PRIOR EXHIBITS AND	5.10 Hrs	675.00 /hr
04/03/2022	J10	DOCUMENTS.	5.10 1115	0/3.00 / 111
04/04/2022	JTG	ATTENTION TO DOCUMENT	8.80 Hrs	675.00 /hr
		PRODUCTION, DEPOSITION		
04/05/0000	TH.0	SCHEDULING AND WITNESS COMM.	7.00.11	475.00./1
04/05/2022	JTG	DOCUMENT DISCOVERY, PRODUCTION AND REVIEW ISSUES.	7.90 Hrs	675.00 /hr
04/06/2022	JTG	CALL WITH COPPOSING COUNSEL; ATTENTION TO	9.20 Hrs	675.00 /hr
		WITNESS, DOC. AND PRODUCTION		
		ISSUES.		
04/07/2022	JTG	DEPOSITION PLANNING AND	9.40 Hrs	675.00 /hr
		SCHEDULIONG; MULTIPLE DOC REVIEW		
04/00/2022	ITC	AND PRODUCTION ISSUES.	0.20 11	475 00 /1
04/08/2022	JTG	ATTENTION TO PRODUCTION AND RECEIPT FROM	9.30 Hrs	675.00 /hr
		OPPOSING SIDE; CORR. WITH OPPOSING		
		COUNSEL; WITNESS SCHEDULING AND		
		RELATED DISCOVERY ITEMS.		
04/09/2022	JTG	DEPOSITION PREPARATION AND	6.30 Hrs	675.00 /hr
		EXHIBIT REVIEW.		
04/10/2022	JTG	ATTENTION TO DEPOSITIONS AND DISCOVERY.	5.60 Hrs	675.00 /hr
04/11/2022	JTG	DEPOSITION OUTLINES; ATTENTION TO	8.20 Hrs	675.00 /hr
· · / 11/ 2022	J = 0	WITNESSES AND DEPOSITION	0.20 1110	37 3. 00 / III
		CATEGORIES; RELATED NOTICES.		

CESARI AND MCKENNA, LLP			BILL NUMBE	ER 58101
04/12/2022	JTG	DISCOVERY ISSUES AND PRODUCTION QUESTIONS; ATTENTION TO ISSUES; DEPOS. PREP WORK.	11.10 Hrs	675.00 /hr
04/13/2022	JTG	DEPOSITION PREPARATION; ATTENTION TO WITNESSES; REVIEW OF KEY DOCS AND EXHIBITS.	10.40 Hrs	675.00 /hr
04/14/2022	JTG	PREPARE FOR AND CONDUCT PREP MEETING WITH FEEDBACK ON DEPO; CORR. WITH EXPERTS; ATTENTION TO DISCOVERY DOC ISSUES.	11.70 Hrs	675.00 /hr
04/15/2022	JTG	MCINTIRE DEPOSITION; 30B6 PREPARATION; ATTENTION TO DOCUMENT ISSUES.	10.90 Hrs	675.00 /hr
04/16/2022	JTG	EXHIBIT AND DEPOSITION ISSUES.	5.80 Hrs	675.00 /hr
04/18/2022	JTG	EVANS AND DAVIES DEPOSITION PREP; ATTENTION TO DISCOVERY ISSUES; 30B6 WORK.	12.30 Hrs	675.00 /hr
04/19/2022	JTG	PREPARE FOR AND CONDUCT DAVIES PREP; ATTENTION TO ADDITIONAL WITNESSES; PROD. QUESTIONS FROM OTHER SIDE; ATTENTION TO INTERROGATORIES; RELATED ISSUES.	12.70 Hrs	675.00 /hr
04/20/2022	JТG	FURTHER ATTENTION TO DAMAGES ISSUES; CORR. WITH EXPERT; DEPOSITION PREPARATION; VARIOUS TEAM EMAILS ON DOC AND DEPOSITION ISSUES; ATTENTION TO PRODUCTION ISSUES.	12.80 Hrs	675.00 /hr
04/21/2022	JTG	PREPARE FOR AND DEFEND BRIAN DAVIES DEPOSITION; REVIEW DOCS; ATTEND PORTION OF MTG; CLIENT EMAILS; TEAM EMAILS; BLUE SUN PREPARATION.	13.20 Hrs	675.00 /hr
04/22/2022	JTG	CALL WITH STONETURN REGARDING; EXCHANGES WITH OPPOSING COUNSEL; ATTENTION TO MITCHELL AND OLSEN PREPS.	10.40 Hrs	675.00 /hr
04/23/2022	JTG	ATTENTION TO DEFENSIVE PREP MATERIALS AND OFFENSIVE DEPOSITION OUTLINES.	9.40 Hrs	675.00 /hr
04/24/2022	JTG	DEPOSITION PREPARATION.	9.80 Hrs	675.00 /hr
04/25/2022	JTG	LEAD OLSEN AND MITCHELL PREPARATIONS; REVIEW RELATED MATERIALS; BLUE SUN PREP.	14.80 Hrs	675.00 /hr
04/26/2022	JTG	DEFEND KPM 30B6; PREPARE FOR BLUE SUN 30B6 DEPOSITION; RELATED CORR.	15.30 Hrs	675.00 /hr
04/27/2022	JTG	FINAL PREPARATION FOR AND	13.80 Hrs	675.00 /hr

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 393 of 418

CESARI AN	D MCKI		BILL NUMBER 581				
04/28/2022	JTG	CONDUCT BLUE SUN DEPOSITION PREPARE FROM W. BROWN DEPOS PREPARE FOR AND TAKE BROWN	·	9.60 Hrs	675.00 /hr		
01, 20, 2022	jīo	DEPOSITION; SEPARATE DISCOVE ISSUES.	RY	,,,,,,	0.000 / 11		
04/29/2022	JTG	PREPARE FOR AND DEFEND MITO DEPOSITION; SCHEDULING ISSUE EMAILS; ATTENTION TO ITG AND ISSUES.	S; TEAM	8.80 Hrs	675.00 /hr		
04/30/2022	JTG	REVIEW EXHIBITS; TEAM CORR.; DEPOSITION PREP.		7.60 Hrs	675.00 /hr		
			TOTAL SER	VICES:	\$190,620.00		
SERVICES S	UMMA	RY					
Gutkoski, Joh	n T.	282.40 675.00	\$190,620.00				
DISBURSE	DISBURSEMENTS:						
StoneTurn Group, LLP; EXPERT FEE 13974 04/26/22			\$2,102.00				
CONSULTII 22897 04/11,		S Target Litigation Consulting, Inc.	\$5,712.58				

VERITEXT; DEPOSITION TRANSCRIPTS 5573048

02/12/2022

TOTAL DISBURSEMENTS: \$9,302.98

\$1,488.40

MATTER TOTAL: \$199,922.98

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 394 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

58101

TOTAL DUE THIS BILL: \$199,922.98

BALANCE PRIOR STATEMENTS

 57706
 03/11/2022
 \$92,790.25

 57845
 04/06/2022
 \$146,050.00

PRIOR BALANCE DUE \$238,840.25

TOTAL NOW DUE: \$438,763.23

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number 58601

July 18, 2022

File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$83,902.50

TOTAL DUE THIS BILL: \$83,902.50

PRIOR BALANCE DUE: \$328,541.08

TOTAL NOW DUE: \$412,443.58

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:

ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number: 58601

July 18, 2022

File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH June 30, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u> 06/01/2022	Atty JTG	Description CONTINUE REVIEW FOR SUPPL. INTERROGATORY RESPONSES; CORR. WITH OPPOSING COUNSEL RE: REQUEST FOR ADDITIONAL DEPOSITION DISCOVERY; REVIEW PROT. ORDER DISCLOSURE	<u>Time</u> 8.60 Hrs	Rate 675.00 /hr
06/02/2022	JTG	CONFIRMATION OF VARIOUS PRODUCTION ISSUES ; CONTINUE UPDATING DETAILED LIST OF INTERROGATORY SUPPL; RELATED TEAM EMAILS; CORR. WITH STONETURN	7.70 Hrs	675.00 /hr
06/03/2022	JTG	FURTHER UPDATES TO INTERROG. SUPPLEMENTATION; REVIEW FEEDBACK FROM ; RESPONSES TO DEFENSE COUNSEL.	9.10 Hrs	675.00 /hr
06/04/2022	JTG	ADDITIONAL WORK ON QUESTIONS TO EXPERT REPORT AND ENSURING INTERROG. RESPONSES COVER IDENTIFIED DETAILS.	4.30 Hrs	675.00 /hr
06/06/2022	JTG	CORR. WITH OPP. COUNSEL RE: DEMANDED MEET AND CONFER; . INTERROGATORIES AND EXPERT REPORT.	8.20 Hrs	675.00 /hr
06/07/2022	JTG	PREPARE FOR AND CONDUCT MEET AND CONFER SESSION WITH OPPOSING	11.80 Hrs	675.00 /hr

CESARI AND MCKENNA, LLP		BILL NUMBER	58601	
		COUNSEL; CORR. W/ STONETURN REGARDING CHALLENGES AND SPECIFIC QUESTIONS RAISED; FINALIZE SUPPL. INTERROG. RESPONSES; INTERNAL TEAM EMAILS RE: SAME; REVIEW OF ITEMS IDENTIFIED BY EXPERTS AND CLIENT; FINALIZE RESPONSES		
06/08/2022	JTG	DRAFT, REVISE AND SEND DETAILED RESPONSE TO OPPOSING COUNSEL AND DEMAND FOR ADDITIONAL DISCOVERY INCORPORATING ; ATTENTION TO EXPERT REPORT DETAILS AND SPECIFIC SUPPORT.	5.40 Hrs 6	75.00 /hr
06/10/2022	JTG	CORR. WITH OPPOSING COUNSEL RE MOTIONS TO SEAL AND TO COMPEL; TEAM CORR.	2.20 Hrs 6	75.00 /hr
06/13/2022	JTG	ATTENTION TO GROUNDS ALLEGED BY DEFENDANTS AND CITATIONS ATTENTION TO ARGUMENTS AVAILABLE; WITH CLIENT.	5.20 Hrs 6	75.00 /hr
06/16/2022	JTG	NOTICE OF NEW JUDGE ASSIGNMENT; INVESTIGATION ; TEAM CORR.	2.30 Hrs 6	75.00 /hr
06/17/2022	JTG	CORR. W/ OPP. COUNSEL RE: ; ADDITIONAL REVIEW OF EXPERT REPORT ; REVIEW OF MOTION TO SEAL AFTER DEF'S FINALLY FILED IT.	3.10 Hrs 6	75.00 /hr
06/21/2022	JТG	SECOND CHANGE OF JUDGE ASSIGNMENT; INVESTIGATION OF INDICTMENT OF I. LUCAS, CHARGES AND APPLICABILITY HERE POTENTIALLY;	5.70 Hrs 6	75.00 /hr
06/23/2022	JTG	VARIOUS TECHNICAL FILINGS FROM COURT; CORR. WITH EXPERTS; REVIEW FROM CLIENT USED BY EXPERTS AND EXPORTED INTO REPORT.	5.80 Hrs 6	75.00 /hr
06/24/2022	JТG	REVIEW MOTION TO COMPEL AND SUPPORTING MATERIALS AND ATTACHMENTS;	6.60 Hrs 6	75.00 /hr

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 398 of 418

CESARI ANI	D MCK	ENNA, LLP	BILL NUMB	ER 58601
06/25/2022	JTG	REVIEW AUTHORITIES CITED IN MOTION; REVIEW ALLEGATIONS REGARDING EXPERT REPORT AND PROPOUND QUESTIONS TO STONETURN.	5.20 Hrs	675.00 /hr
06/27/2022	JTG	PREPARE FOR AND CALL W/ B. MTCHELL AND E. OLSON; FOLLOW UP CALLS WITH E. OLSON; MEETING W/ REVIEW TRANSCRIPTS AND MATERIALS RE: MOTION TO COMPEL.	9.60 Hrs	675.00 /hr
06/28/2022	JTG	CORR. W/ OPP/ COUNSEL AND WITH EXPERT; WORK ON OPP. TO MOTION TO COMPEL.	7.80 Hrs	675.00 /hr
06/29/2022	JTG	REVIEW OF RECORD MATERIALS AND INJUNCTION PROCEEDINGS REGARDING USE AND DISCLOSURE OF CUSTOMER DETAILS AND RELATED NOTICE; CONTINUE WORK OPPOSING MOTION TO COMPEL.	7.30 Hrs	675.00 /hr
06/30/2022	JTG	ATTENTION TO OPPOSITION; AND SUPPORTING RECORD MATERIALS	8.40 Hrs	675.00 /hr
		TOTAL SEI	RVICES:	\$83,902.50

SERVICES SUMMARY

Gutkoski, John T.	124.30	675.00	\$83,902.50
StoneTurn Group, LLP; EXPERT F 06/23/2022	EE		\$70,191.50
StoneTurn Group, EXPERT FEE	06/23/2	2022	-\$70,191.50

MATTER TOTAL: \$83,902.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 399 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

58601

TOTAL DUE THIS BILL: \$83,902.50

BALANCE PRIOR STATEMENTS

58101 05/05/2022 \$199,922.98 58332 06/10/2022 \$128,618.10

PRIOR BALANCE DUE \$328,541.08

TOTAL NOW DUE: \$412,443.58

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 58733 August 11, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$69,255.00

TOTAL DUE THIS BILL: \$69,255.00

PRIOR BALANCE DUE: \$212,520.60

TOTAL NOW DUE: \$281,775.60

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 58733 August 11, 2022 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH July 31, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	Description	<u>Time</u>	<u>Rate</u>
07/01/2022	JТG	STUDY OF RELIED UPON BY EXPERT REPORT AND ALLEGATIONS OF MISSING INFO BY DEFENDANTS;	7.30 Hrs	675.00 /hr
		ATTENTION TO OPPOSITION BRIEF.		
07/02/2022	JTG	WORK ON OPPOSITION.	2.40 Hrs	675.00 /hr
07/05/2022	JTG	ASSEMBLE OUESTIONS FOR EXPERTS ATTENTION TO OPPOSITION ARGUMENTS.	7.60 Hrs	675.00 /hr
07/06/2022	JТG	STUDY OF CASES FROM RESEARCH CONDUCTED BY S. MAGEE; ADDITIONAL RESEARCH; PRIORITIZE SECTIONS OF THE OPPOSITION BRIEF; SEND INQUIRIES TO EXPERTS.	8.40 Hrs	675.00 /hr
07/07/2022	JTG	DRAFT AND REVISE OPPOSITION BRIEF; INPUT FROM TEAM AND EXPERTS; ATTENTION TO MOTION TO SEAL.	8.80 Hrs	675.00 /hr
07/08/2022	JТG	INCORPORATE COMMENTS ON DRAFT; REVISE, FINALIZE AND FILE OPPOSITION BRIEF; WORK WITH S. MAGEE REGARDING EXHIBITS AND REDACTIONS.	7.40 Hrs	675.00 /hr
07/11/2022	JTG	TEAM ATTENTION TO SUPPL. PRODUCTION AND ISSUES RE: LUCAS INDICTMENT; SIDE ISSUES ON MOTION TO SEAL.	1.10 Hrs	675.00 /hr
07/13/2022	JTG	CLIENT COMMUNIC. RE:	0.30 Hrs	675.00 /hr
07/18/2022	JTG	ATTENTION TO EXPERT DEPOSITION TOPICS AND NEEDS FOR CAUSES OF	2.20 Hrs	675.00 /hr

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 402 of 418

CESARI ANI	D MCK	ENNA, LLP	BILL NUMB	ER 58733
		ACTION ALLEGED.		
07/20/2022	JTG	CONTINUED ATTENTION TO EXPERT DEPOSITION TOPICS AND NEEDS FOR CAUSES OF ACTION ALLEGED.	2.60 Hrs	675.00 /hr
07/22/2022	JTG	INITIAL DOWNLOAD AND REVIEW OF DEFENDANTS' REBUTTAL REPORT.	2.70 Hrs	675.00 /hr
07/24/2022	JTG	DETAILED STUDY OF OPPOSITION EXPERT REPORT.	6.60 Hrs	675.00 /hr
07/25/2022	JTG	WORK WITH EXPERT REPORTS;	8.80 Hrs	675.00 /hr
07/26/2022	JTG	ATTEND TO BUDGET; CONTINUED WORK WITH EXPERT REPORTS.	8.40 Hrs	675.00 /hr
07/27/2022	JTG	WORK ON DEPOSITION OUTLINE AND PREPARATION PLAN FOR EXPERTS.	9.10 Hrs	675.00 /hr
07/28/2022	JTG	PREPARE FOR AND CONDUCT MEETING WITH EXPERTS AND TEAM RE: OPPOSING EXPERT REPORT TEAM EMAILS RE: SAME; REVIEW ORDER	9.60 Hrs	675.00 /hr
07/29/2022	JTG	ON MOTION TO COMPEL; TEAM AND CLIENT EMAILS ON COURTS' ORDER. CONTINUE WORK OF DEPOSITION OUTLINE AND EXHIBITS; CORR. W/OPPOSING COUNSEL; CALL WITH ENTITY DEFENDANTS' LEAD COUNSEL RE:	9.30 Hrs	675.00 /hr
		SCHEDULE AND IRVIN LUCAS INDICTMENT; TEAM EMAILS AND INPUT.	EDVICES	↑ <0.255.00

TOTAL SERVICES: \$69,255.00

SERVICES SUMMARY

Gutkoski, John T. 102.60 675.00 \$69,255.00

MATTER TOTAL: \$69,255.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 403 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

58733

TOTAL DUE THIS BILL:

\$69,255.00

BALANCE PRIOR STATEMENTS

 58332
 06/10/2022
 \$128,618.10

 58601
 07/18/2022
 \$83,902.50

PRIOR BALANCE DUE \$212,520.60

TOTAL NOW DUE: \$281,775.60

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 59229 October 18, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$107,730.00

TOTAL DUE THIS BILL: \$107,730.00

PRIOR BALANCE DUE: \$167,163.10

TOTAL NOW DUE: \$274,893.10

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:

ABA/Routing Number: Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 59229 October 18, 2022 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH September 30, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

Date	Atty	<u>Description</u>	<u>Time</u>	<u>Rate</u>
09/01/2022	JTG	ATTENTION TO OPPOSITIONS TO	6.70 Hrs	675.00 /hr
		MOTIONS.		
09/02/2022	JTG	ATTENTION TO BRIEFS.	4.80 Hrs	675.00 /hr
09/06/2022	JTG	WORK ON MOTIONS.	9.60 Hrs	675.00 /hr
09/07/2022	JTG	ATTENTION TO <u>MOTION</u> S.	10.20 Hrs	675.00 /hr
09/08/2022	JTG	ATTENTION TO FOR MOTIONS.	9.10 Hrs	675.00 /hr
09/09/2022	JTG	WORK ON MOTIONS.	8.80 Hrs	675.00 /hr
09/10/2022	JTG	REVIEW DEPOSITION EXHIBITS.	8.30 Hrs	675.00 /hr
09/11/2022	JTG	WORK ON MOTION OPPOSITIONS.	7.90 Hrs	675.00 /hr
09/12/2022	JTG	DRAFT OPPOSITIONS.	9.80 Hrs	675.00 /hr
09/13/2022	JTG	ATTENTION TO OPPOSITIONS.	8.70 Hrs	675.00 /hr
09/14/2022	JTG	WORK ON MOTION OPPOSITIONS.	8.30 Hrs	675.00 /hr
09/15/2022	JTG	MOTION OPPOSITIONS.	8.70 Hrs	675.00 /hr
09/16/2022	JTG	MOTION OPPOSITIONS.	8.60 Hrs	675.00 /hr
09/17/2022	JTG	REVISING OPPOSITIONS.	10.40 Hrs	675.00 /hr
09/18/2022	JTG	REVISE AND FINALIZE FIRST	10.20 Hrs	675.00 /hr
		OPPOSITION.		
09/19/2022	JTG	FINALIZE AND WORK WITH TEAM TO	15.30 Hrs	675.00 /hr
		FILE OPPOSITIONS.		
09/21/2022	JTG	ATTENTION TO REDACTIONS AND	4.10 Hrs	675.00 /hr
		RECORD AND SEALING.		
09/27/2022	JTG	ATTENTION TO REPLIES.	5.20 Hrs	675.00 /hr
09/28/2022	JTG	STRATEGY DEVELOPMENT ON REPLIES.	4.90 Hrs	675.00 /hr
		TOTALS	SERVICES:	\$107,730.00

SERVICES SUMMARY

BILL NUMBER

59229

MATTER TOTAL: \$107,730.00

BILL NUMBER

59229

TOTAL DUE THIS BILL: \$107,730.00

BALANCE PRIOR STATEMENTS

 58601
 07/18/2022
 \$12,520.60

 58733
 08/11/2022
 \$69,255.00

 58966
 09/09/2022
 \$85,387.50

PRIOR BALANCE DUE \$167,163.10

TOTAL NOW DUE: \$274,893.10

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 59492 November 21, 2022 File Number 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

PROFESSIONAL SERVICES

CURRENT SERVICES: \$53,595.00

TOTAL DUE THIS BILL: \$53,595.00

PRIOR BALANCE DUE: \$74,893.10

TOTAL NOW DUE: \$128,488.10

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:
ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 59492 November 21, 2022 File Number: 254002

KPM Analytics North America Corporation 113 Cedar Street Suite S3 Milford, MA 01757

SERVICES THROUGH October 31, 2022

KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	Description	<u>Time</u>	<u>Rate</u>
10/03/2022	JTG	SJ ARGUMENT OUTLINE PREPARATION.	5.20 Hrs	675.00 /hr
10/05/2022	JTG	ATTENTION TO DEPOSITION	1.70 Hrs	675.00 /hr
		SCHEDULING AND DEFENDANTS' DELAYS.		
10/06/2022	JTG	INJUNCTION ARGUMENT OUTLINE PREP.	5.60 Hrs	675.00 /hr
10/07/2022	JTG	ADDITIONAL INJUNCTION ARGUMENT ATTENTION.	2.40 Hrs	675.00 /hr
10/12/2022	JTG	ATTENTION TO EXPERT DEPOSITION DELAYS AND LOGISTICAL ISSUES,	3.60 Hrs	675.00 /hr
10/14/2022	JTG	QUESTIONS FOR EXPERT AS TO RECORDS AND USE IN DEPOSITION.	3.10 Hrs	675.00 /hr
10/17/2022	JTG	INSIST ON DEPOSITION SCHEDULING AND NOTICE; DEPOSITION PREP.	5.50 Hrs	675.00 /hr
10/20/2022	JTG	REVIEW OF RECORDS	7.40 Hrs	675.00 /hr
		FOR DEPOSITION.		
10/25/2022	JTG	REVIEW OF PROPOSED QUESTIONS FROM STONETURN FOR OPPOSING EXPERT; DEPOSITION OUTLINE.	6.20 Hrs	675.00 /hr
10/26/2022	JTG	REVIEW OF REPORT AND	7.80 Hrs	675.00 /hr
10/20/2022	J10	SUPPORTING MATERIALS; DEPOS. PREP.	7.00 1115	075.00 / 111
10/27/2022	JTG	WORK THROUGH CRITICISMS OF	8.10 Hrs	675.00 /hr
, ,	5	ZOLTOWSKI / STONETURN REPORT AND		,
		PREPARE COUNTER QUESTIONS.		
10/28/2022	JTG	EXPERT DEPOSITION PREPARATION.	7.90 Hrs	675.00 /hr
10/29/2022	JTG	COMPLETE DEPOSITION OUTLINE.	5.00 Hrs	675.00 /hr
10/31/2022	JTG	COMPLETE PREP.; DEPOSE DR.	9.90 Hrs	675.00 /hr
		KENNEDY; FOLLOW UP TEAM MESSAGES.		
		TOTAL SE	RVICES:	\$53,595.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 410 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER 59492

SERVICES SUMMARY

Gutkoski, John T. 79.40 675.00 \$53,595.00

MATTER TOTAL: \$53,595.00

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 411 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

59492

TOTAL DUE THIS BILL:

\$53,595.00

BALANCE PRIOR STATEMENTS

59229 10/18/2022

\$74,893.10

PRIOR BALANCE DUE

\$74,893.10

TOTAL NOW DUE:

\$128,488.10

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 59744 December 22, 2022 File Number 254002

KPM Analytics North America Corporation 8 Technology Drive Suite 100 Westborough, MA 01581

PROFESSIONAL SERVICES

CURRENT SERVICES: \$23,692.50

TOTAL DUE THIS BILL: \$23,692.50

PRIOR BALANCE DUE: \$128,488.10

TOTAL NOW DUE: \$152,180.60

Wiring Information:
Cesari and McKenna, LLP
Boston Private Bank & Trust Co.
Ten Post Office Square
Boston, MA 02109
Account Number:

ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number: 59744 December 22, 2022 File Number: 254002

KPM Analytics North America Corporation 8 Technology Drive Suite 100 Westborough, MA 01581

SERVICES THROUGH November 30, 2022

<u>KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]</u>

File Number 254002 0001

<u>Date</u>	<u>Atty</u>	<u>Description</u>	<u>Time</u>	<u>Rate</u>
11/09/2022	JTG	LEGAL RESEARCH ON TRADE SECRET AND LAW OF 93A CASES AND TRIALS.	4.90 Hrs	675.00 /hr
11/10/2022	JTG	CONTINUE LEGAL RESEARCH AND REVIEW OF EVIDENTIARY ISSUES.	4.80 Hrs	675.00 /hr
11/14/2022	JTG	ATTENTION TO EVIDENCE AND RELATED SITUATIONS.	4.60 Hrs	675.00 /hr
11/17/2022	JTG	CONTINUED LOOK AT ADMISSIBILITY OF EVIDENCE RELATED THERETO.	5.20 Hrs	675.00 /hr
11/18/2022	JTG	TEAM CORR. AND RELATED LOOK AT INFORMATION .	4.40 Hrs	675.00 /hr
11/22/2022	JTG	ATTENTION TO INFORMATION AND CORRELATION WITH EXPERT REPORT OPINIONS AND PLANNED TESTIMONY.	5.50 Hrs	675.00 /hr
11/29/2022	JTG	ATTENTION TO EXPERT OPINION QUESTIONS AND DEFENDANTS' DEDUCTIONS.	2.30 Hrs	675.00 /hr
11/30/2022	JTG	CONTINUED LOOK AT EXPERT OPINION ISSUES.	3.40 Hrs	675.00 /hr

TOTAL SERVICES: \$23,692.50

SERVICES SUMMARY

Gutkoski, John T. 35.10 675.00 \$23,692.50

BILL NUMBER

59744

MATTER TOTAL:

\$23,692.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 415 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

59744

TOTAL DUE THIS BILL: \$23,692.50

BALANCE PRIOR STATEMENTS

 59229
 10/18/2022
 \$74,893.10

 59492
 11/21/2022
 \$53,595.00

PRIOR BALANCE DUE \$128,488.10

TOTAL NOW DUE: \$152,180.60

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

> Bill Number 59909 January 6, 2023 File Number 254002

KPM Analytics North America Corporation 8 Technology Drive Suite 100 Westborough, MA 01581

PROFESSIONAL SERVICES

CURRENT SERVICES: \$18,292.50

TOTAL DUE THIS BILL: \$18,292.50

PRIOR BALANCE DUE: \$52,180.60

TOTAL NOW DUE: \$70,473.10

Wiring Information: Cesari and McKenna, LLP Boston Private Bank & Trust Co. Ten Post Office Square Boston, MA 02109

Account Number: ABA/Routing Number:

Swift Code:

One Liberty Square, Suite 310 Boston, MA 02109 (617) 951-2500

Bill Number: 59909

January 6, 2023

File Number: 254002

KPM Analytics North America Corporation 8 Technology Drive Suite 100 Westborough, MA 01581

SERVICES THROUGH December 31, 2022

<u>KPM Analytics North America Corporation v. Blue Sun Scientific, LLC et al [Civ. Action No. 21:-10572]</u>

File Number 254002 0001

Date	<u>Atty</u>	<u>Description</u>	<u>Time</u>	Rate
12/06/2022	JTG	ATTENTION TO SJ ISSUES.	4.70 Hrs	675.00 /hr
12/09/2022	JTG	ATTENTION TO CASES RE:	5.10 Hrs	675.00 /hr
	_	DAMAGES.		
12/13/2022	JTG	CONTINUED RESEARCH ON	5.40 Hrs	675.00 /hr
	_	INJUNCTION/DAMAGES ISSUE.		
12/15/2022	JTG	ATTENTION TO EVIDENCE LOGISTICS.	3.80 Hrs	675.00 /hr
12/20/2022	JTG	CONTINUE LEGAL RESEARCH.	4.40 Hrs	675.00 /hr
12/29/2022	JTG	ATTENTION TO DAMAGES, SCHEDULE	3.70 Hrs	675.00 /hr
	J	AND WITNESS AVAILABILITY ISSUES.		

TOTAL SERVICES: \$18,292.50

SERVICES SUMMARY

Gutkoski, John T. 27.10 675.00 \$18,292.50

MATTER TOTAL: \$18,292.50

Case 4:21-cv-10572-MRG Document 275-1 Filed 07/26/23 Page 418 of 418

CESARI AND MCKENNA, LLP

BILL NUMBER

59909

TOTAL DUE THIS BILL: \$18,292.50

BALANCE PRIOR STATEMENTS

 59229
 10/18/2022
 \$10.00

 59492
 11/21/2022
 \$28,478.10

 59744
 12/22/2022
 \$23,692.50

PRIOR BALANCE DUE \$52,180.60

TOTAL NOW DUE: \$70,473.10